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WASTE DISPOSAL, INC.
SOIL AND SUBSURFACE GAS OPERABLE UNIT
RECORD OF DECISION

Waste Disposal, Inc. Superfund Site

Santa Fe Springs, California

United States Environmental Protection Agency
Region 9 - San Francisco, California

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Santa Fe Springs, California****Part I Declaration**

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Attachment A

PART I DECLARATION FOR THE RECORD OF DECISION

1.0 Site Name and Location

Waste Disposal, Incorporated (CERCLIS ID #CAD980884357)
Los Nietos Road at Greenleaf Avenue
Santa Fe Springs, California

2.0 Statement of Basis and Purpose

This decision document presents the selected remedial action for the Waste Disposal, Inc. site in Santa Fe Springs, California, which was chosen in accordance with CERCLA, as amended by SARA, and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan. This decision is based on the Administrative Record for this site.

The State of California agrees with the selected remedy.

3.0 Assessment of the Site

Actual or threatened releases of hazardous substances from the site, if not addressed by implementing the response action selected in this Record of Decision, may present an imminent and substantial endangerment to public health, welfare, or the environment.

4.0 Description of the Remedy

This operable unit is the first of two planned operable units for the site. An operable unit is a discrete portion of a response action under CERCLA. The first operable unit addresses contaminated soil and subsurface gases. This action addresses the principal threat at the site, which is exposure to contaminated soil, through containment and institutional controls.

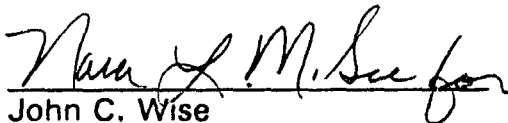
The major components of the selected remedy include:

- Consolidation of contaminated soil beneath a multilayered, RCRA-equivalent cap
- Capping approximately 17 acres of the 43-acre site with above mentioned cap (approximately 75% asphalt, 25% vegetation top cover);
- Extraction and treatment by flaring of subsurface gases, if necessary;
- Institutional controls that restrict future use of properties with residual contamination that pose an exposure risk; and
- Groundwater monitoring.

5.0 Statutory Determinations

The selected remedy is protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost-effective. This remedy uses permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable for this site. However, because treatment of the principal threat of the site was not found to be practicable, this remedy does not satisfy the statutory preference for treatment as a principal element. Because this remedy will result in hazardous substances remaining on-site above health-based levels, a review will be conducted within five years after commencement of the remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment.

This ROD will be followed by another operable unit ROD which will address groundwater and the final remediation of the Site.



John C. Wise
Deputy Regional Administrator
United States Environmental Protection Agency
Region IX

12-27-93
Date

PART II DECISION SUMMARY

1.0 Site Name, Location, and Description

The Waste Disposal, Inc. (WDI) Superfund site is located in the city of Santa Fe Springs, Los Angeles County, California, on a 43-acre parcel of land. The facility is bordered on the northwest by Santa Fe Springs Road, on the northeast by Fedco Food Distribution Center (Fedco) and St. Paul High School, on the southwest by Lost Nietos Road, and on the southeast by Greenleaf Avenue (see Figure 1). Residences are located across from the facility on Greenleaf Avenue. The remaining areas on and across Los Nietos Road and Santa Fe Springs Road are occupied by industrial complexes.

2.0 Site History

The WDI site contains a 42 million gallon capacity concrete reservoir originally constructed for crude petroleum storage. The reservoir was decommissioned in the late 1920s for product storage, and was subsequently used for disposing of a variety of industrial wastes. Aerial investigations, records searches and previous site sampling indicate the surrounding grounds also were used as unlined sumps for disposal. Disposal activities continued unregulated until 1949, and thereafter under permit from Los Angeles County, until closure in 1964. Documentation on disposal was sporadic, but investigations have shown that drilling muds, sludges, tank bottoms, various industrial wastes, and construction debris and other solid wastes were disposed at WDI.

WDI stopped accepting wastes in 1964, bringing in fill and covering the site, including the reservoir. Across most of the site, between 5-15 feet of clean fill, cover the contaminated soil. However, several areas have contaminated surface soil (within the first five feet). Since 1966, when grading was completed, the site has been divided into multiple lots, and various businesses have developed on the site (see Figure 2). The area over the reservoir, however, is vacant, except for one small portion covered with an asphalt parking lot used for recreational vehicle storage.

3.0 Enforcement Activities

The site was placed on the National Priorities List (NPL) in July of 1987. After the site was listed, EPA sent General Notice Letters to 28 Potentially Responsible Parties (PRPs). The list included current and former property owners, generators, and transporters identified during the PRP Search. At that time, no party came forward with a good faith offer to conduct the Remedial Investigation (RI), so EPA began the RI. In 1988, EPA undertook a removal action, erecting a fence around

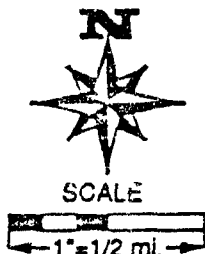
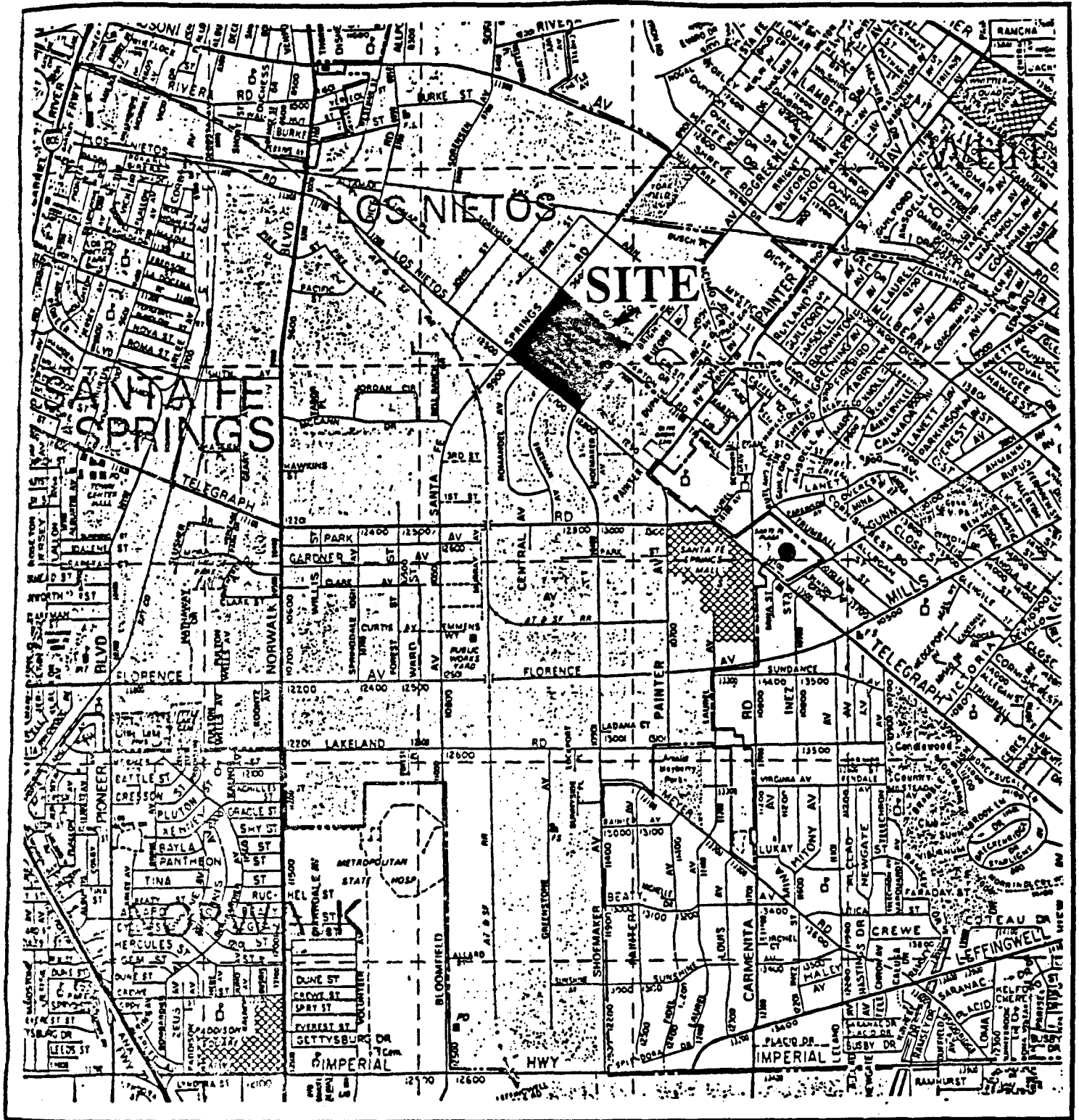


Figure 1 Site Location Map

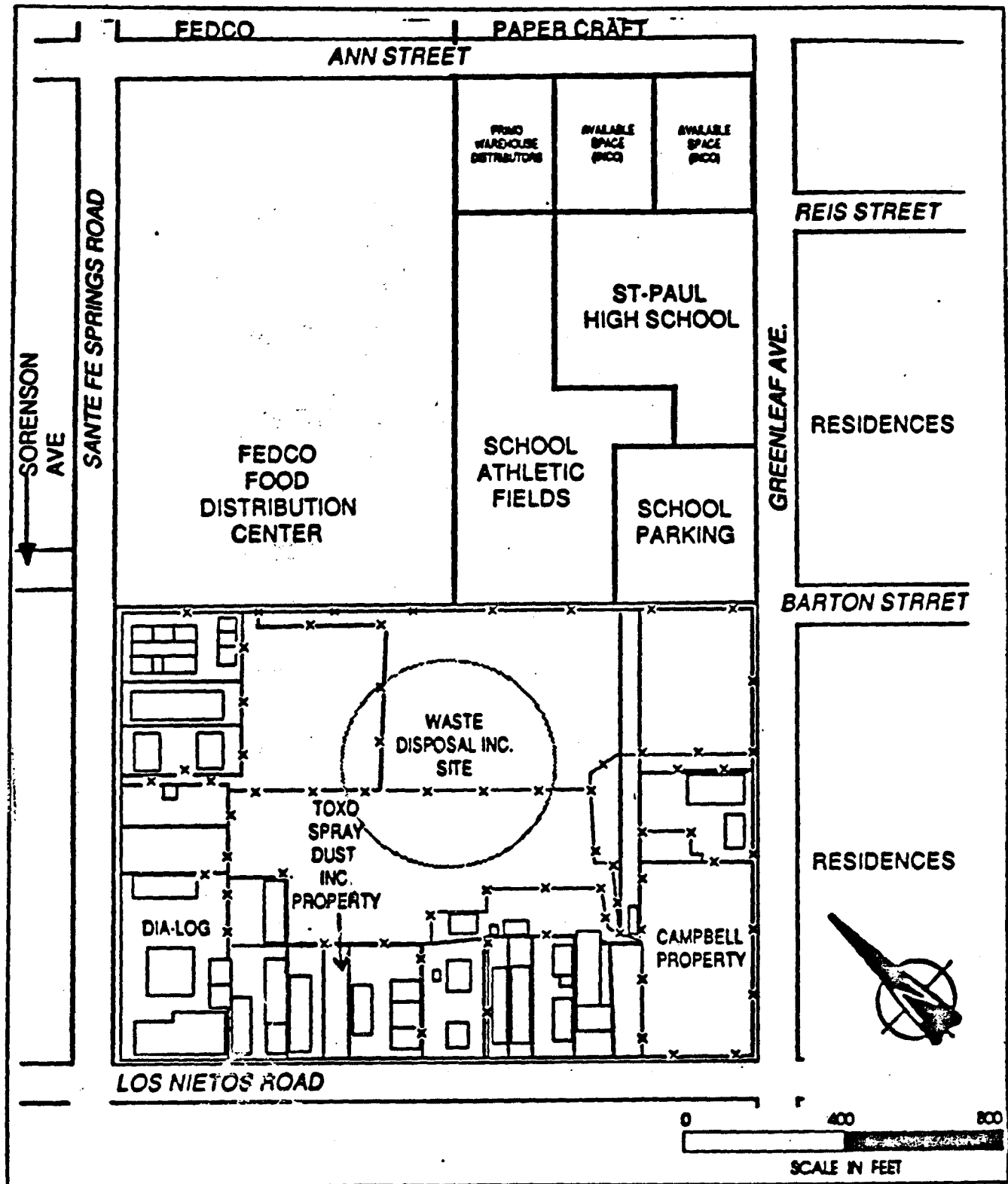


Figure 2 Facility Plan

one corner of the site to improve site security and prevent accidental exposure to surface contamination.

EPA completed the RI in November 1990, and initiated a Feasibility Study (FS). The State of California expressed reservations about the groundwater data, and suggested that EPA conduct further sampling. In January 1992, EPA began three quarters of groundwater monitoring, culminating in the January 1993 Groundwater Sampling Report. However, the data did not conclusively identify a source for groundwater contamination on site, and EPA decided to divide the site into two operable units so that more information could be collected for groundwater without delaying the decision for the remaining contaminated media. In August 1993, EPA completed the FS for contaminated soils and subsurface gases.

4.0 Highlights of Community Participation

EPA released the Proposed Plan for Contaminated Soil and Subsurface Gases to the public on August 12, 1993, at the same time making the Administrative Record available in the information repository maintained at the Santa Fe Springs City Library. EPA also mailed the Proposed Plan to interested individuals on the mailing list.

A public comment period was held from August 12, 1993 through October 31, 1993. This comment period included two extensions, one requested by the City of Santa Fe Springs and the second requested by a PRP. During the public comment period, EPA conducted a public meeting, held September 1, 1993 in Santa Fe Springs. At this meeting, representatives from EPA presented the Proposed Plan, answered questions about the site and the remedial alternatives under consideration, and accepted comments from the public. The notice of availability of the RI reports, FS, Proposed Plan, and the rest of the administrative record, the start of the comment period and the scheduled Public Meeting was published in both the *Los Angeles Times (Southeast Section Edition)* and the *Whittier Daily News* on August 12, 1993. EPA also published two additional notices in these papers announcing the extensions to the public comment period on September 23, 1993 and October 22, 1993.

In addition to the official Proposed Plan public meeting mentioned above, EPA presented its Proposed Plan to the Santa Fe Springs City Council on August 26, 1993 and the City Planning and Development Office on September 9, 1993. EPA also conducted an informative meeting for the parents of St. Paul High School, which is located adjacent to the site, on September 9, 1993.

During its meetings with the community, EPA heard from some members of the community that they felt overwhelmed by the Superfund process, and that without more time to think and study the information provided, they would not be able to

adequately understand the issues and provide their comments. EPA committed to more community involvement during the design process, so the community would have several more opportunities to provide input and make their feelings known. This open design process will require more public meetings than generally required during the design phase, but will ultimately lead to a remedy design that incorporates more input from both the public and the involved regulatory agencies that should be more acceptable to all concerned parties.

More of the community's concerns can be found in the transcript of the public meeting. EPA's responses can be found in the Responsiveness Summary, Part III of this ROD.

5.0 Scope and Role of Operable Unit

As with many Superfund sites, the contamination at the WDI site cover several environmental media, and each must be addressed in order to reduce the risks posed by the site. The work at WDI has been divided into two operable units (OUs). These are:

- OU One - Contaminated Soils and Subsurface Gas
- OU Two - Contamination in the Groundwater

The first OU is the subject of this ROD. More data will be collected before a decision will be made concerning contaminated groundwater found beneath the site.

6.0 Summary of Site Characteristics

Because the RI conducted by EPA is the most recent and extensive investigation to date, the site characteristics are based primarily on its findings. The Final Remedial Investigation Report of November 1989 (Ebasco), as well as the media-specific reports (available in the Administrative Record), should be referred to for a detailed description and analysis of contaminants found at the site.

The contamination present on-site at WDI exists in the soil and groundwater matrices, and in the form of subsurface gases. Present in on-site soils are large amounts of oil well drilling muds and sludges and waste products, metals, low concentrations of volatile organic compounds and semivolatile organic compounds, low concentrations of pesticides and PCBs, and lead. Methane is the most prevalent subsurface gas, with the highest concentrations in the reservoir area. Volatile organic compounds also were detected in the subsurface gas. Groundwater samples contained several metals in concentrations above MCLs, as well as volatile organic compounds. Because this ROD only covers soils and

subsurface gases, this document does not discuss groundwater characteristics in further detail.

The remedial investigation generated a large quantity of data, which can be found in the Final RI Report. Samples were taken at St. Paul High School to establish background levels. Background levels for the area established in the US Geologic Survey (USGS) Professional Paper 1270, *Element Concentrations in Soils and Other Surficial Materials of the Conterminous United States*, have also been taken into account. The primary contaminants in soils at WDI are the drilling muds and oil-field wastes appearing as black oily material or tar-like sludge. The constituents of these wastes (in levels greater than those detected in the background) include:

- Metals - arsenic, beryllium, thallium, and lead
- Volatile Organic Compounds - toluene, methylene chloride, acetone, ethylbenzene, 2-butanone, and xylene
- Semivolatile Organic Compounds - benzo(a)pyrene, 2-chlorophenol, naphthalene, 2-methylnaphthalene, 4-nitrophenol, phenanthrene, chrysene, 1,4-dichlorobenzene, benzo(a)anthracene, anthracene, pyrene, phenanthrene, pentachlorophenol, and fluorene
- Pesticides - DDD, DDE, DDT, alpha- and gamma-chlordane, and dieldrin in surface soils
- PCBs in the surface soils

In the twenty six soil vapor monitoring wells, sampling revealed ten gases present in the subsurface. These gases were methane, benzene, 1,1,1-trichloroethane, 1,2-dibromoethane, 1,2-dichloroethane, carbon tetrachloride, chloroform, tetrachloroethane, trichloroethene, and vinyl chloride.

There are also barrels containing investigation derived wastes (mainly soils from the installation of wells). and barrels containing various debris and wastes from previous industrial activities. All of these will be addressed through this ROD.

7.0 Summary of Site Risks

The information on site risks is taken from the Final Endangerment Assessment of November 1989, with additional information provided in the Feasibility Study of August, 1993. These documents should be consulted if greater detail is needed.

Under current site conditions, possible exposure pathways consist of direct contact with contaminated surface soils and inhalation of airborne particulates and volatiles by students and nearby residents. The average risks, both cancer and non-cancer, are based on the average contaminant concentration for the site and a typical exposure scenario. The maximum risks are based on the highest concentrations observed at the site for each contaminant combined into one "composite sample"

that represents the source of contamination and the maximum plausible exposure scenario (even if the chance for exposure to the highest level of contamination is very small). The future risk scenario assumes an exposure to residents with homes built on the site, and no protective measures taken. This provides the maximum exposure scenario for which protective actions can be taken.

For the WDI site, the highest risks are posed by arsenic, thallium, benzene, pesticides, PCBs, and vinyl chloride. These risks for current exposure scenarios are almost within what EPA considers acceptable without any remedial action, but can pose an elevated threat to future users of the site. Arsenic presents the highest threat at the site, but is also found in background soils in the Santa Fe Springs area. The background levels, recognized by the US Geologic Survey as averaging 6.5 mg/kg and found in the background samples at 2.3 mg/kg, are within the EPA acceptable risk range for residential exposure. Some on-site samples, however, detected arsenic at significantly higher levels than background.

8.0 Description of Alternatives

The alternatives summarized here were presented in the Proposed Plan. A detailed evaluation of all the alternatives is presented in the Feasibility Study (FS) Report for Soils and Subsurface Gas dated August 2, 1993. (The FS, Proposed Plan, and the rest of the Administrative Record can be found at the Santa Fe Springs City Library on Telegraph Road.) Several alternatives were screened out prior to the nine-criteria analysis used to evaluate the alternatives presented in the Proposed Plan, including complete excavation and off-site disposal of contaminated soils, and on- and off-site incineration.

8.1 *Alternative 1: No Action*

The No Action alternative, required by the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300.430(e)(6)), provides, among other things, an analysis of the risk posed by the facility if no remedial action is conducted. Therefore, it is used as a baseline alternative against which other alternatives are measured. With this alternative, there would be no reduction of toxicity, volume or mobility of the contaminants. The only actions that would take place would be re-seeding of any areas where vegetation was disturbed by on-site activities during the investigation, periodic monitoring required by CERCLA (because wastes will be left on-site), and five year reviews to evaluate site conditions over time.

8.2 *Alternative 2: Fencing, Revegetation, and Institutional Controls*

Site access would be restricted under this alternative. The site would be fenced to prevent direct contact with the contamination exposed at the site. The

perimeter fence along Greenleaf Avenue and St. Paul's High School would be augmented to a minimum height of seven feet and topped with barbed wire and razor ribbon to prevent access by trespassers. The rest of the perimeter fence would be inspected and repaired where necessary. Figure 3 shows the proposed fencing diagram for this alternative. Areas disturbed during the remedial investigation would be revegetated.

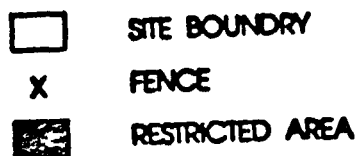
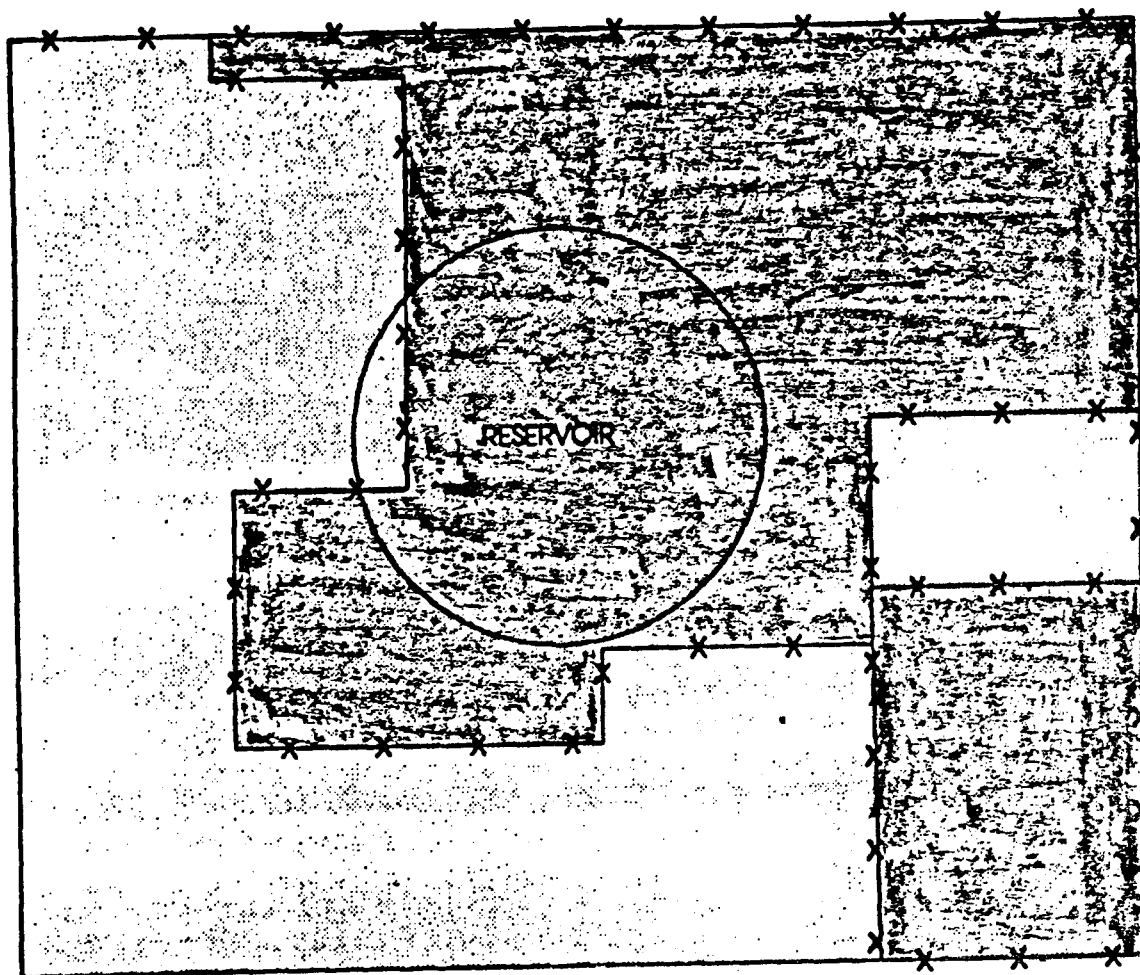


Figure 3 Fencing Diagram

Institutional controls would be implemented to restrict land use. The purpose of these controls would be to prevent exposure to contaminated media, and would include placing a notice on the deed, preventing the use of the groundwater beneath the site, preventing development on parcels within the site boundary that could cause exposure to contamination, and restrictions on the use of the fenced parcels. While the property owners would have some discretion to propose future uses, the institutional controls will ensure that any future use is protective of human health.

Because wastes would remain on-site, annual monitoring along with a series of five-year reviews to evaluate changes in site conditions would be required for this alternative. Annual monitoring would include soil, subsurface gas, and groundwater media. The barrels of waste material currently on the property would be properly disposed off-site.

8.3 *Alternative 3: Containment*

There are four options to this alternative, all of which entail some type of cap over the contaminated areas. Excavation is included for some of the options of this alternative. Excavated materials would be consolidated under the cap. Option A is a multi-layer soil cap, Option B is an asphalt cap, Option C is a RCRA-equivalent asphalt cap, and Option D is an impermeable hazardous waste RCRA cap. The goal of this alternative is to prevent exposure to contamination, so land use decisions would take exposure scenarios into consideration.

Land use restrictions would be implemented to prevent activities that might breach or damage the cap. Restrictions also would be implemented to prevent the use of the groundwater in the shallow aquifer underneath the site, and to restrict use of properties with residual contamination so that potential contact with contamination beneath the properties is prevented.

The containment options might also require a landfill gas venting and treatment system, since the gases would no longer be able to slowly permeate the existing soil cap and release to the atmosphere. With a cap in place, the landfill gases generated might migrate laterally from under the cap and infiltrate surrounding buildings. More testing and sampling would be done to determine the volume and extent of gas generation, but a venting remedy is likely to be necessary. To prevent migration of landfill gases, a combination of passive and active venting would be installed. Passive venting consists of perforated plastic tubing which provides gases a means of transport to the surface for treatment. The active portion of the system consists of a blower which would pull gases to the surface through the vapor wells installed in the reservoir. The treatment would be simple flaring of the gases, with any condensation generated from this process being contained and disposed off-site.

Because the wastes would remain on-site for all options under this alternative, 5-year reviews would be required. The annual monitoring strategy for all the options of this alternative would include cap stability evaluations, in addition to monitoring groundwater and subsurface gas contaminant levels over time.

8.3.1 Option A: Multi-Layered Soil Cover

This option involves the installation of a multi-layered soil cap over all accessible waste handling areas and the reservoir. The lower layer would be a compact clay layer having a low permeability. The upper layer would be topsoil and vegetation. Option A provides erosion and moisture control and controls off-site migration of contaminated dust. The cap would cover approximately 860,000 square feet (approximation based on aerial photographs). This area corresponds to Areas 3, 4, 6, 7, and most of Area 2. (See Figure 4 for the cap area.) The barrels of soil from the remedial investigation (soils from the well drilling) would be consolidated under the cap. The remaining barrels of waste materials would be disposed off-site. The entire site, with the exception of the businesses presently operating, would be fenced and posted.

8.3.2 Option B: Asphalt Cap without Excavation

This option would place a six-inch asphalt cap (four inches of gravel overlain by two inches of asphalt) over any exposed soil areas of the site. This would provide an additional physical barrier between the contaminated soils and the surface population. Like Option A, no excavation of contaminated material would be done on the site. The only earth moving work would be consolidating the barreled investigation derived wastes (IDW) under the cap, and perhaps some addition of soil to even up site grade for installation of the asphalt cap. The asphalt would cover approximately 860,000 ft², the same area as Option A.

8.3.3 Option C: RCRA-equivalent Asphalt Cap with Limited Excavation

The cap material for this option itself is similar to Option B, but this option would cover a smaller area of the site because the limited excavation would consolidate the contaminated material under a smaller space. The intent of the excavation is to remove the contaminated soils found in the sumps and other areas to the background (or a 10^{-6} excess cancer risk) level for the contaminants of concern, and consolidate them under the cap so that some parcels on the property can be free from some of the institutional controls. An additional Flexible Membrane Liner (FML) would also be added underneath the asphalt cap to reduce the possibility of rainwater infiltration. With the membrane liner and gas remedy system, this cap would meet the substantive requirement of the more extensive RCRA cap described as Option 4. The estimated area covered by this option is 750,000 ft². Figure 5 presents the area to be capped and the areas to be excavated.

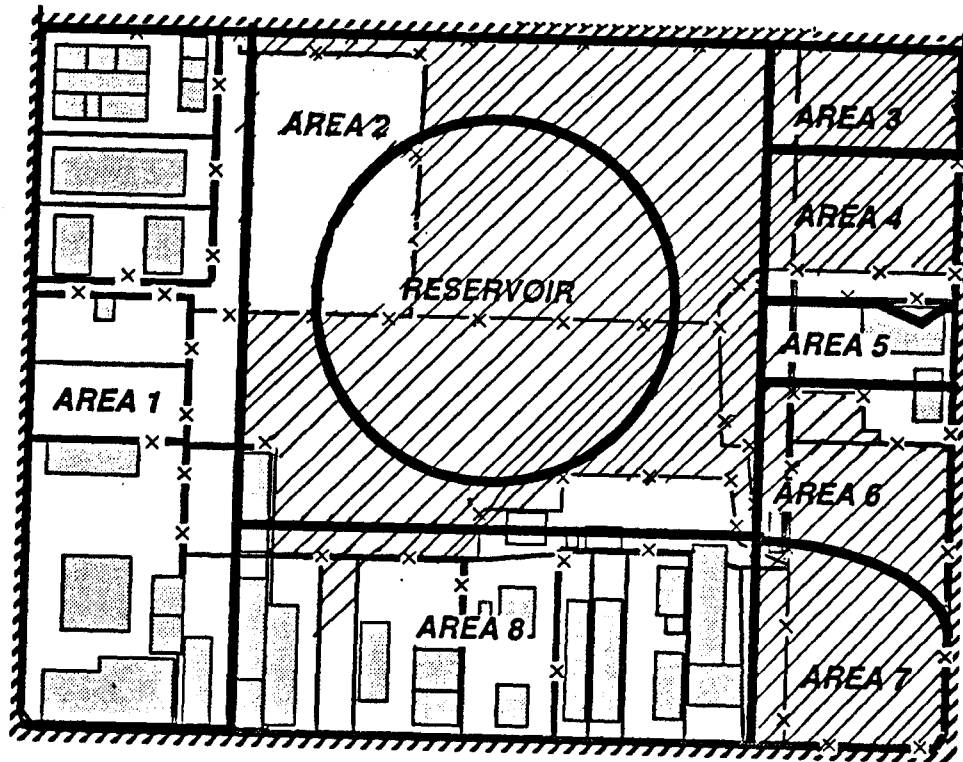


Figure 4 Area to be Capped for Alternatives 3A and 3B

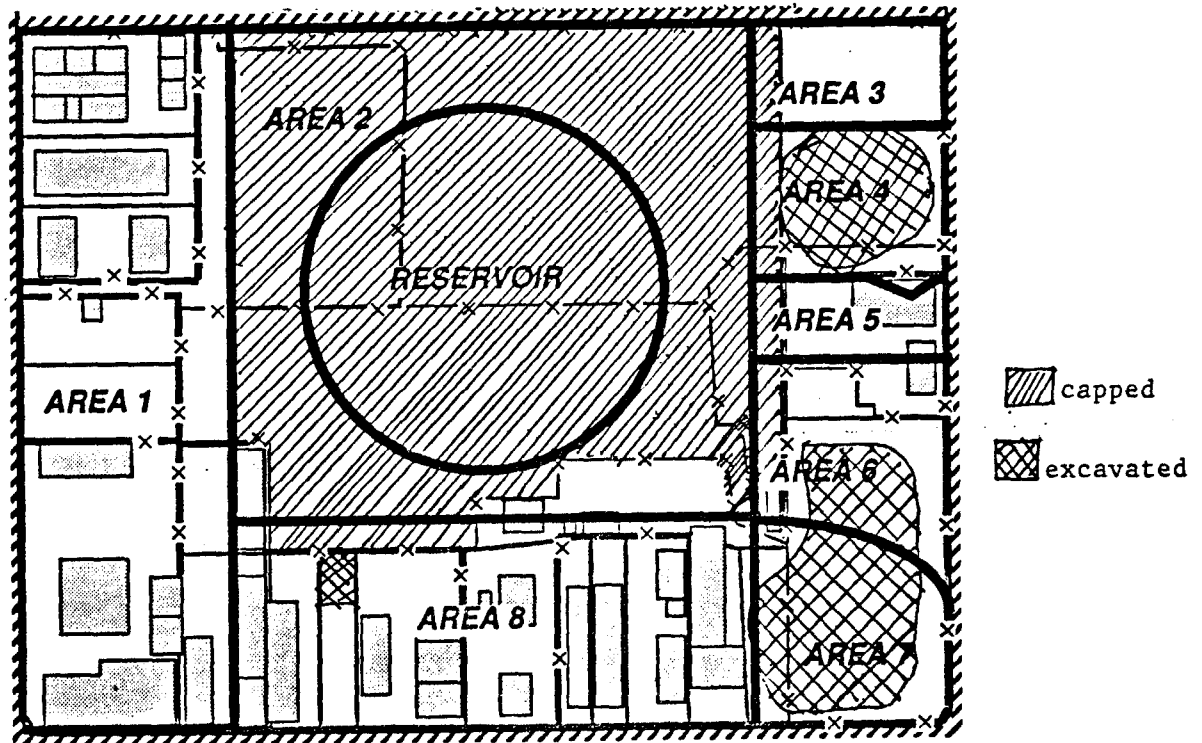


Figure 5 Areas to be Excavated and Capped for Alternatives 3C and 3D

8.3.4 Option D: Multi-Layered Hazardous Waste Final Cover

For Alternative 3, Option D, a multi-layered cap meeting the requirements for surface impoundment/landfill closure, as defined in 40 CFR 264.221 and 264.228, would be installed. The cap would cover approximately 750,000 square feet, the same area as that of Option C, shown in Figure 5. Limited excavation would be done to consolidate contamination not currently contained and protected by asphalt or structures. This alternative would provide erosion and moisture control and prohibit upward vertical migration of contaminants (liquid, solid, gas/vapor) through a series of low permeability layers and synthetic liners. Figure 6 shows a schematic of a full RCRA cap structure.

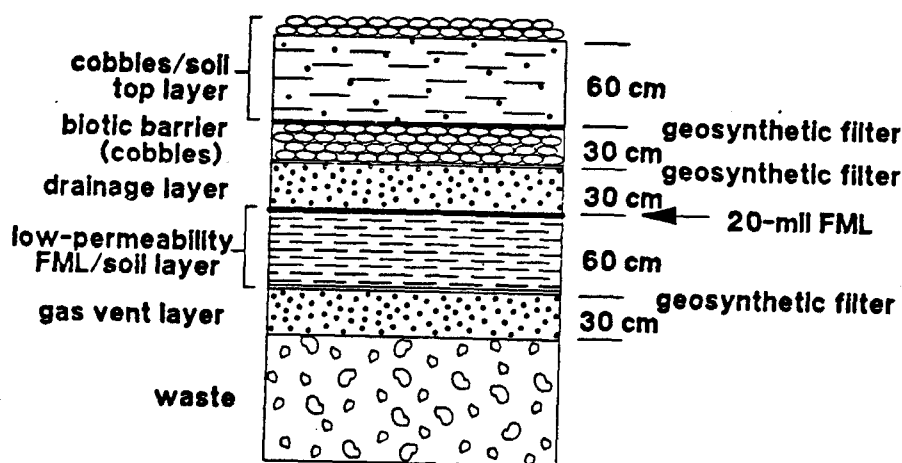


Figure 6 Cross-section Schematic of a Full-RCRA Cap

8.4 Alternative 4: Excavation and Off-site Disposal

This alternative would excavate contaminated material and dispose of it at an off-site facility permitted to accept such wastes. In the FS, two options to this alternative were presented: (A) excavation of only the areas described in the Alternative 3 options, with subsequent fencing and institutional controls of the reservoir area, and (B) complete excavation of all contaminated soils at the site,

including the reservoir and Area 2,. The option for complete excavation was discarded due to the very high cost, increased short term risks, and the small increase in long term effectiveness versus the other alternatives.

The alternative presented in the Proposed Plan was Option A, limited excavation (as explained for Alternatives 3C and 3D), off-site disposal, fencing of the remainder of the property, and institutional controls.

9.0 Summary of Comparative Analysis of Alternatives

The NCP sets forth nine criteria to be used for a detailed, comparative analysis of alternatives that have been retained after the screening portion of the Feasibility Study. The nine criteria are as follows:

- Compliance with ARARs
- Overall protection of human health and the environment
- Long-term effectiveness and permanence
- Reduction of toxicity, mobility, or volume through treatment
- Short-term effectiveness
- Implementability
- Cost
- State acceptance
- Community acceptance

A detailed analysis was presented in the Feasibility Study, while a summary was in the Proposed Plan, not including an evaluation of State and Community acceptance. The comment period on the Proposed Plan provided this information, which is included in Table 1. For a more detailed evaluation of the alternatives and the nine criteria, please refer to Chapter 5 of the Feasibility Study of August 2, 1993.

Table 1 Comparison of Alternatives

Criteria	Alt 1 No Action	Alt 2 Fencing, Revegetation, and Institutional Controls	Alt 3A Multi-layer Soil Cap	Alt 3B Asphalt Cap without Excavation	Alt 3C RCRA- equivalent Asphalt Cap with Limited Excavation	Alt 3D Full RCRA Cap with Limited Excavation	Alt 4A Limited Excavation and Off-site Disposal
Overall Protectiveness	No, however risk levels are within, or only slightly above, levels EPA considers acceptable	No, however risk levels are within, or only slightly above, levels EPA considers acceptable	Moderate, depending on maintenance of the cap.	Moderate, depending on maintenance of the cap.	Yes	Yes	Moderate, since surface contamination removed and current risk levels are within, or only slightly above, levels EPA considers acceptable
ARAR Compliance	No, does not meet landfill closure requirements	No, does not meet landfill closure requirements	No, since permeability may not meet landfill closure requirements	No, since permeability may not meet landfill closure requirements	Yes	Yes	No
Long-term Effectiveness	No, since wastes will be left on-site, with no effective control to prevent contact with contamination	No, since wastes will be left on-site, with no effective control to prevent contact with contamination	Yes, so long as cap integrity is maintained to prevent exposure to contamination	Yes, so long as cap integrity is maintained to prevent exposure to contamination	Yes, integrity of cap more easily maintained than 3A, 3B to prevent exposure to contamination	Yes, integrity of cap is more assured because of multiple layers, therefore preventing exposure to contamination	No, since wastes will be left on-site, with no effective control to prevent contact with contamination
Implementability	Yes	Yes	Yes	Yes	Yes	Yes	Moderate. Transporting soil may be difficult.

Table 1 Comparison of Alternatives

Criteria	Alt 1 No Action	Alt 2 Fencing, Revegetation, and Institutional Controls	Alt 3A Multi-layer Soil Cap	Alt 3B Asphalt Cap without Excavation	Alt 3C RCRA- equivalent Asphalt Cap with Limited Excavation	Alt 3D Full RCRA Cap with Limited Excavation	Alt 4A Limited Excavation and Off-site Disposal
Short-term Effectiveness	Yes	Yes	Yes	Yes	Slight increase in short-term risk due to excavation. Precautions would be taken to mitigate risks.	Slight increase in short-term risk due to excavation. Precautions would be taken to mitigate risks.	Slight increase in short-term risk due to excavation. Precautions would be taken to mitigate risks.
Reduction of Toxicity, Mobility or Volume through Treatment	No	No	Though there would be no treatment of contaminated soils, there would be some reduction of mobility due to decrease in rainwater infiltration. Flaring system would reduce volume and mobility of subsurface gases through treatment.	Though there would be no treatment of contaminated soils, there would be some reduction of mobility due to decrease in rainwater infiltration. Flaring system would reduce volume and mobility of subsurface gases through treatment.	Though there would be no treatment of contaminated soils, there would be some reduction of mobility due to decrease in rainwater infiltration. Flaring system would reduce volume and mobility of subsurface gases through treatment.	Though there would be no treatment of contaminated soils, there would be some reduction of mobility due to decrease in rainwater infiltration. Flaring system would reduce volume and mobility of subsurface gases through treatment.	No treatment to reduce TMV, but would reduce on-site volume by excavation and off-site disposal.
Cost	\$427,000	\$457,000	\$2,095,500	\$3,259,500	\$5,514,700	\$12,824,700	\$12,937,700

Table 1 Comparison of Alternatives

Criteria	Alt 1 No Action	Alt 2 Fencing, Revegetation, and Institutional Controls	Alt 3A Multi-layer Soil Cap	Alt 3B Asphalt Cap without Excavation	Alt 3C RCRA- equivalent Asphalt Cap with Limited Excavation	Alt 3D Full RCRA Cap with Limited Excavation	Alt 4A Limited Excavation and Off-site Disposal
State Acceptance	The State indicated that it would not support a decision of No Action.	The State has indicated that it would not support a decision where no physical measures were taken to reduce risks.	The State has expressed its support for permanent containment remedy, but would require more than only a soil cap.	The State has express its support for a permanent containment remedy, and an asphalt cover would meet most of their requirements.	The State has expressed its support for this option.	The State has expressed its support for this option.	The State has expressed its support for a permanent containment option, and since this alternative would leave a great deal of contaminated material in place, would not be supported.
Community Acceptance	The community has expressed no interest in a no-action remedy selection.	The community has expressed its interest in having the contamination removed, and would not support only administrative approaches.	The community generally supported this option, since it would be aesthetically pleasing. Had reservations with all containment options concerning protectiveness, since contamination remains.	The community was somewhat supportive of this option, but had concerns with final appearance and overall protectiveness and long term safety of any containment option.	The community was somewhat supportive of this option, but had concerns with final appearance, protectiveness, effectiveness, and long term safety of any containment option.	The community was somewhat supportive of this option, but had concerns with protectiveness, effectiveness, and long term safety of any containment option, as well as the finished height of this option.	The community was not supportive of this option. They would like all the contaminated soil removed, not just a portion, with the remainder of the site fenced.

10.0 The Selected Remedy

Based upon consideration of the requirements of CERCLA, the detailed analysis of the alternatives using the nine criteria, and public comments, EPA has determined that a hybrid of Alternatives 3A and 3C is the most appropriate alternative for the WDI Superfund Site. The goal of the remedy is to provide a permanent barrier to the contaminated soil, prevent rainwater from infiltrating the contaminated soils and carrying the contamination into the groundwater, prevent gases from migrating off the property, and maximize the beneficial end use of the site to the extent practicable.

The selected remedy is protective, meets ARARs, and is effective for the long-term and is permanent. While it does not meet the statutory preference for treatment of the principle threat, landfill gases may be treated if necessary. The selected remedy is constructable with readily available materials and common construction techniques, so is considered implementable. Short-term risks will be slightly elevated during construction, but measures will be taken to minimize the impacts. Since the cap will be impermeable, groundwater will be protected, thus further reducing the risks posed by the site.

This remedy is considered cost effective, and has been accepted by the State of California. During the design process, the community will have the opportunity to participate in determining the ultimate configuration of the remedy, so that community acceptance, as much as possible, will be achieved.

Concerns of both the citizens and the City Council of the City of Santa Fe Springs, were that EPA's Proposed Plan (Alternative 3C was the preferred alternative) would result in an unattractive mound of black asphalt that would be useless to all concerned, as well as an eyesore to the residents of Santa Fe Springs and the students of St. Paul High School. As a result, the decision for the final configuration of the cap will be made during the design phase of the project with input and involvement from the community. This involvement provides for public meetings describing the design as it develops through the design process, and input into the decision-making processes in determining the configuration and final design of the cap. The cap will be required to meet an impermeable standard of 10^{-7} cm/sec. Materials that will be used to achieve this performance standard will be evaluated during the design phase.

With the selected remedy, the site will be capped with an impermeable, RCRA-equivalent cap, with the surface configuration to be determined during design. For cost estimating purposes, EPA estimates that a liner will cover the capped area, with approximately 75% of the cap surface asphalt, and the remainder of the cap area a soil and vegetation cover. This configuration of the remedy will be protective and provide for a more attractive solution to the site problems.

The following are the key components of the selected remedy:

- Excavating designated areas to clean-up standards (see Table 2)
- Consolidating excavated materials within Area 2
- Placing perforated piping for the passive gas extraction system throughout area to be capped (Figure 5)
- Constructing RCRA-equivalent, impermeable cap over the reservoir and designated areas (see Figure 7 for estimated final configuration).
- Monitoring gases that emanate from the site, and installation of an extraction and treatment system if constituents and volume of gases require it
- Implementing institutional controls so that future use of the site is compatible with the remedial goals and the integrity of the cap is maintained, parcels that have residual contamination are restricted from activities that could lead to exposure to contaminated soils, and shallow groundwater use is prohibited

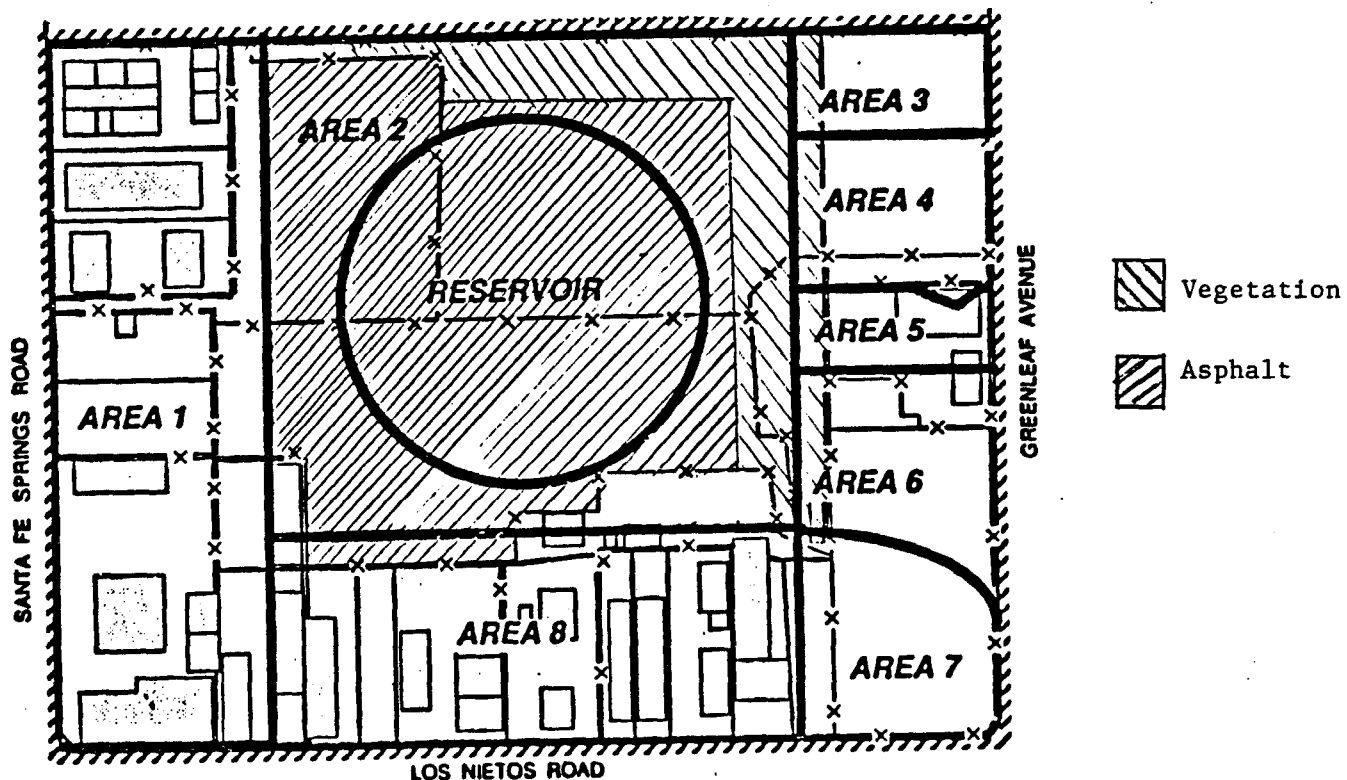


Figure 7 Approximate Configuration of Selected Remedy Cap

10.1 Clean-up Standards

The purpose of the excavation of the selected remedy is to remove the sump material from the undeveloped areas and consolidate the contaminated material. Since no ARARs were identified for clean-up standards for soils, the standards for the excavation are based upon either background, or health based levels (preliminary remediation goals, or PRGs, were used, and are explained in the Feasibility Study) for the contaminants without detectable background levels. The clean-up standards have been established so that the contaminated soils and sump materials are removed, while soils at or near background levels are left in place. Table 2 presents the contaminants of concern, the health based PRG (based on residential exposure), the background level, if any, and the clean-up standard.

Table 2 PRGs, Background Levels, and Clean-up Standards for Contaminants of Concern in Soils at WDI			
CHEMICAL	PRG (mg/kg)	BACKGROUND (mg/kg)	CLEAN-UP STANDARDS (mg/kg)
Arsenic	0.97	2.31 (6.5 USGS)	10.0
Beryllium	0.41	0.278	0.41
Chromium	44	12.10	44
Cadmium	39	0.363	39
Lead	500	7.00	500
Thallium	5.5	12.00	12.0
Benzene	2.7	---	2.7
Dieldrin	0.11	---	0.11
DDT, DDE, DDE	5	---	5
cPAHs	0.23	---	0.23
PCBs	0.22	---	0.22

The clean-up standard for arsenic higher than background was selected. This decision was based on several factors. First, background levels in soils pose an excess cancer risk to residents ranging from approximately 2.5×10^{-6} , based on samples from St. Paul High School, to almost 7×10^{-6} , based on USGS background levels for the general area. Secondly, the areas to be excavated are currently zoned for light industrial use, and any proposed development would be limited to industrial use only. The PRG for industrial soil exposure is 3.3 mg/kg, so the clean-up standard of 10.0 mg/kg, which is three times the PRG, would yield a risk of approximately 3×10^{-6} for industrial use. This approximates the current risk posed to residents in the area from the natural, background soils. Lastly, the institutional controls that will be placed on the properties will ensure that none of the properties are used for residential purposes.

10.2 *Limited Excavation and Consolidation*

The areas to be excavated are identified in Figure 5. These areas were chosen because of the levels of contamination found at and beneath the surface, the accessibility of the selected areas since they are vacant, and remediation will maximize economic redevelopment opportunities. No businesses or buildings would be disrupted by this excavation. Other areas of the site where contamination was discovered are covered either with buildings, pavement, or both. These structures prevent direct contact with any existing contamination beneath the soil, and therefore meet the main goal of this remedy, which is to prevent direct contact with the contaminated soils.

The excavated material will be moved to the Area 2 portion of the site, where the cap will be placed. The existing clean surface fill will be pushed back so that the excavated material can be covered over by clean fill prior to the placing of the first layer of the cap. The final grade of the site will be made such that drainage and run-off is uniform and directed to the storm drains, and that there will be no collection of standing water on the cap. The excavated portions will be refilled with clean fill, compacted, and graded.

Dust suppression will be employed during the excavation, so that the potential for contaminant migration during excavation is greatly reduced. Suppression techniques include water or polymer spraying on the surface, wind breaks, and other methods for reducing the amount of migrating dust. Air monitoring will also be required during the excavation to ensure that any subsurface gases encountered during the excavation are dealt with properly, and that the activities at the site are not adversely impacting local air quality.

10.3 *Passive Venting System*

Since methane, the major component of subsurface gases detected at the site, is lighter than air, it tends to move upward through the soil until it arrives at the surface, where it is released into the atmosphere. If buildings occupy the space above the area where methane is generated, the gas could collect and pose a fire or explosion hazard. The gas could also migrate laterally if there is not an outlet in the vertical direction. For this reason, perforated piping will be placed on the surface of the site, prior to the placement of the cap. The piping will direct the rising gases to the surface atmosphere, where they can be vented or treated if necessary. If an active gas extraction system is necessary (the volume of subsurface gases is high, or its components require extraction), the passive system will be piped to the active extraction system and all the gas will be treated in one flaring system (if volume is sufficient to burn). If the risks posed by the gases cannot be mitigated by flaring, an alternate treatment such as carbon adsorption will be evaluated and implemented. Section 10.5 discusses the active gas extraction and treatment component of the remedy.

10.4 *RCRA-equivalent Impermeable Cap*

The actual cap will be constructed as a multi-layer, impermeable cap that meets the substantive requirements of RCRA. Its components will be determined during the design phase, but its final configuration will have a permeability of 10^{-7} cm/sec, which will provide protection of groundwater as well as maintain the performance of the cap over the long-term. For cost analysis purposes, it was assumed that the preferred alternative in the Proposed Plan, Alternative 3C, would comprise the major portion of the cap, with approximately 563,000 ft² of the site capped with a flexible membrane, gravel, and asphalt. The remaining 190,000 ft² will be covered with a multi-layered vegetation cap.

10.5 *Gas Monitoring, and Active Gas Extraction and Treatment*

Prior to any excavation or construction, the vapor wells will be sampled to estimate the volume of gases beneath the site and determine the proper gas treatment components. A flux chamber may be used to estimate the volume and make-up of gases permeating the existing soil cover of the site, since the cap will prevent the permeation of gases to the atmosphere that is presumably occurring. Once these data are collected, an analysis will be performed to determine if an active gas extraction system is necessary. If the volume of gases rising to the surface warrant treatment, an active system must be put in place so that the gases may be treated by flaring. If there are chlorinated components to the extracted gases, a wet scrubber may be necessary for the flare.

The active system would utilize existing vapor wells as extraction wells. The gases would be pulled from the wells by a blower, and directed to a flare, where they will be destroyed. If the volume of methane is not high enough to allow burning, then another treatment, such as carbon adsorption, will be used.

10.6 Institutional Controls

Institutional controls are legal restrictions placed on a property to restrict types of use. In general, institutional controls are either (1) government controls imposed by state or local governments; or (2) proprietary controls, such as deed restrictions, whereby a party holding an interest in a parcel of property restricts the use of that property. The purpose of institutional controls is to prevent use of the site that could facilitate contact with contaminated soils. The restriction on use of the property will depend on the level of contamination that exists on the parcel, and the risks posed by that contamination. The institutional controls may vary from a simple notice on the deed stating that contamination exists on the property (if the contamination is deep and low-level), to restrictions on digging or excavation that could expose the contaminated soil. Restrictions will also be made for the use of groundwater beneath the site.

There will also be restrictions on the compatible uses of the capped areas of the site. Since the purpose of these restrictions is to maintain the integrity of the cap, only those uses that will not adversely affect the cap will be allowed. Some of the compatible uses include recreation (e.g., tennis and basketball courts, miniature golf), and light storage. Uses that are not compatible include heavy equipment storage, enclosed buildings, and any structure that would need to break the integrity of the asphalt in order to be built. While EPA recognizes that there may be isolated cases where the cap may be breached and suitably repaired, EPA will discourage all but the most substantive justifications for tampering with the remedy and the integrity of the cap.

Restrictions placed on the properties with residual contamination will be determined during negotiations with each property owner. In general, if there is contamination beneath a property that can pose a health risk, there will be a restriction placed on the property. At the very least, the restriction in the deed will state that contaminated material exists beneath the site. The deed restriction will be utilized when contamination is at least 15 feet deep, and the likelihood for direct contact, even with construction activities, is minimal.

For contamination that lies within the first 15 feet, a determination will be made as to whether the contamination poses a health threat. For arsenic, for example, levels less than 10.0 mg/kg will not require any additional restriction other than a notice. For arsenic levels greater than 10.0 mg/kg, restrictions will require that suitable mitigation measures be implemented to protect workers and surrounding

residents from the risks posed by the contamination and the potential exposure. These measures would include sampling prior to any work being performed, worker protection and dust suppression during any construction, and remediation if necessary. A similar determination will be made for other contaminants found on the properties. The final development of the institutional controls will be made during negotiations in the design phase.

Vegetation planted on the soil and clay cap must be low-maintenance and drought tolerant. Also, the root systems of the selected plants will be fairly shallow, so that the roots do not penetrate the clay layer. The plants will also be chosen to maximize erosion protection along the slopes. At a minimum, the vegetation should be sustainable for the climate of Santa Fe Springs without irrigation (after initial planting) and require little maintenance. Once the vegetation begins growing, only minimal work will be required for upkeep and maintenance.

10.7 *Annual Inspection*

All components of the remedy will be inspected and evaluated not less than annually. Special circumstances (such as earthquakes or heavy rains) may require additional inspections. Monitoring will be conducted as required by ARARs, and include groundwater sampling, vapor well sampling, and flare performance and emissions (if there is a flare). The site will also be inspected to ensure that the cap integrity is maintained, and that institutional controls are in effect. Operation and maintenance will be conducted to ensure that the remedy maintains its effectiveness.

10.8 *Cost*

A detailed cost description of each of the components of the remedy is included in the FS. The estimated cost for the selected remedy is shown in Table 3 as a present worth value, and includes annual monitoring for 30 years and appropriate 5-year reviews.

10.9 *Design Options*

During the Public Comment period, several suggestions were made to enhance the selected remedy. These included a block retaining wall between the site and the St. Paul High School athletic fields, and a gas trench near the border of the site to prevent gas migration onto those fields. These suggestions will be taken into account during the design, since they may be somewhat mutually exclusive given current site conditions (especially the trees along the border). The trench may also be incompatible with the gas extraction system.

Table 3 Selected Remedy Costs	
Component	Present Worth Cost
Monitoring <ul style="list-style-type: none"> • Subsurface gas samples - \$3600/yr • Groundwater samples - \$4235/yr • Annual reporting - \$5000/yr • Five Year Reviews - \$10,000 each 	\$252,000
Excavation of Contaminated soil <ul style="list-style-type: none"> • 78,000 yd³ @ \$10/yd³ 	\$780,000
Replacement Fill <ul style="list-style-type: none"> • 52,000 yd³ @ \$0.10/yd³ 	\$5,200
Flexible Membrane Liner <ul style="list-style-type: none"> • 750,000 ft² @ \$2.40/ft² 	\$1,800,000
Clay layer (1 foot thick, 10⁻⁷ permeability) <ul style="list-style-type: none"> • 7000 yd³ @ \$13/yd³ 	\$91,000
Top Soil (1 foot thick) <ul style="list-style-type: none"> • 7000 yd³ @ \$14.50/yd³ 	\$101,500
Vegetation (hydroseeding) <ul style="list-style-type: none"> • 21,000 yd² @ \$1.25/yd² 	\$26,250
Asphalt Paving <ul style="list-style-type: none"> • 562,500 ft² @ \$3.00/ft² 	\$1,687,500
Gas Collection and Treatment System	\$427,500
Total	\$5,170,950

11.0 Statutory Determinations

EPA must select remedies that are protective of human health and the environment, comply with applicable or relevant and appropriate requirements (unless a statutory waiver is justified), are cost-effective, and utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable. In addition, CERCLA includes a preference for remedies that employ treatment that permanently and significantly reduce the toxicity, mobility, or volume of hazardous wastes as their principal element. The following sections discuss how the selected remedy meets these statutory requirements.

11.1 *Protection of Human Health and the Environment*

The selected remedy protects human health and the environment through the reduction of direct contact with contaminated soil by constructing a multi-layered cap. The cap will also reduce the potential for rainwater to leach contaminants from the soil into the groundwater. The gas venting component of the remedy will reduce the potential for migration of subsurface gases laterally from the site, and will treat the gases, if necessary, to reduce the impact to local air quality.

Institutional controls will be implemented so that permanent restrictions will be in place to notify future land owners of the extent and risks of residual contamination. The restrictions placed on the parcels will prevent inadvertent contact with contaminated soil for the parcels where no excavation or capping will take place. For the capped area, the institutional controls will maintain the integrity of the cap so that contaminated material is effectively contained.

There are some short-term risks associated with this remedy while excavation and consolidation of the contaminated soils are performed. However, dust suppression measures will be taken to minimize this risk.

11.2 *Compliance with Applicable or Relevant and Appropriate Requirements*

The specific regulations that are applicable or relevant and appropriate for the WDI site are listed below. All of these regulations are action-specific ARARs. For a description of the regulations, see Table 2-3 of the Feasibility Study. This list constitutes EPA's determination of the ARARS for the activities outlined as the selected remedy. The ARARs identified for WDI for the selected remedy are:

Hazardous Waste Control Act (HWCA) (State equivalent of RCRA) that are Relevant and Appropriate:

- Monitoring for Interim Status Facilities, 22 CCR § 66265.97 (a) - (d)
- Landfill Closure and Post-closure Care, 22 CCR § 66265.310 (a), (c)
- Seismic Design Standards, 22 CCR § 66265.25 (b)

California Integrated Waste Management Board Regulations that are Relevant and Appropriate:

- Gas Monitoring and Control During Closure and Post-closure, 14 CCR Chapter 3, § 17783-17783.15
- Post Closure Land Use, 14 CCR § 17796

South Coast Air Quality Management District (SCAQMD) Regulations that are Applicable:

- Regulation IV
 - Rule 401 - Visible Emissions
 - Rule 402 - Nuisance
 - Rule 403 - Fugitive Dust
 - Rule 404 - Particulate Matter (Concentration)
 - Rule 405 - Solid Particulate Matter
 - Rule 407 - Liquid and Gaseous Air Contaminants
 - Rule 408 - Circumvention
 - Rule 409 - Combustion
 - Rule 473 - Disposal of Solid and Liquid Wastes
- Regulation XI
 - Rule 1150.2 - Control of gaseous emissions from inactive landfills

South Coast Air Quality Management District (SCAQMD) Regulations that are Relevant and Appropriate:

- Regulation IX - Standards of Performance of New Stationary Sources
- Regulation X - National Emission Standards for Hazardous Air Pollutants
- Regulation XI -
 - Rule 1108.1 - Emulsified Asphalt
 - Rule 1150 - Excavation of Landfill Site

In addition, the guidance document, EPA/530-SW-89-047, July 1989, "Final Covers on Hazardous Waste Landfills and Surface Impoundments" will be used in implementing the selected remedy.

11.3 Cost Effectiveness

EPA believes this remedy will significantly reduce the risks at this site by eliminating the pathway for direct contact with contaminated soil. This remedy will also reduce the potential for rainwater leaching contaminants from the soil into the groundwater by the construction and maintenance of the impermeable cap. This will be done at an estimated cost of approximately \$5,170,000, which EPA considers reasonable for the risk reduction that will be achieved.

11.4 Use of Permanent Solutions and Alternative Treatment Technologies to the Maximum Extent Practicable

The selected remedy utilizes permanent solutions and alternative treatment technologies (or resource recovery) to the maximum extent practicable. However, the treatment of the principal threats of the site was evaluated in the FS and

screened out because it was not found to be practicable. The remedy consists of proven technologies, common construction materials and practices, and incorporates EPA guidance for closing permitted landfills to provide a protective, permanent solution to the site problems.

11.5 *Preference for Treatment as a Principal Element*

It was determined that treatment of the principal threats of the site was not practicable for this site. The main contaminant posing site risks, arsenic, is not readily treatable in the soil. However, treatment is a contingency of the subsurface gas component of the remedy. EPA believes that the selected remedy, though not implementing treatment as part of its principal element, is protective for the long-term and currently implementable.

12.0 Documentation of Significant Changes

The Proposed Plan for the Waste Disposal, Inc. Superfund Site was released for public comment in August 1993. An Asphalt Cap with Flexible Membrane Liner was the main component of the remedy, with limited excavation and consolidation of some contaminated soils under the proposed cap. EPA has reviewed all written and verbal comments submitted during the public comment period, and has made its decision with only minor changes to the remedy.

Instead of a full asphalt cover over the capped area of the site, the cap will consist of a multi-layered, RCRA-equivalent cap with a performance standard permeability of 10^{-7} cm/sec. The components and final configuration of the cap will be determined during the design phase, with additional community involvement in making those final determinations. The decision was made to allow for greater public participation during the design phase in response to public comments and City concerns for the aesthetics of the finished remedy. This has a small effect on cost, and impacts long-term effectiveness slightly, since some of the cap surface may be vegetation which might be easier to breach than asphalt. However, since the cap will be essentially impermeable, the selected remedy will still be protective of human health and the environment.

Additional design options were added as a result of comments received during the comment period. A block retaining wall between the site and St. Paul High School will be considered in order to provide more security for the site, as well as block the view of the site from the school. A gravel trench for gas migration prevention will also be considered. However, current site conditions must be carefully evaluated and adequate involvement from the High School, because in order to implement both design options, the trees currently growing between the site and the High School may have to be removed.

PART III RESPONSIVENESS SUMMARY

1.0 Introduction

This Responsiveness Summary provides EPA's response to comments received on the Proposed Plan for Contaminated Soil and Subsurface Gas at WDI. The Proposed Plan was made available for public review and comment on August 12, 1993. During a public meeting on September 1, 1993 EPA presented the alternatives for addressing the soil and subsurface gas contamination, described EPA's preferred alternative, answered questions, and received public comments on the Proposed Plan. EPA also made a presentation to the Santa Fe Springs City Council on August 26, 1993, and to the parents of St. Paul High School students on September 9, 1993.

The public comment period ended on October 31, 1993. In addition to the comments received during the public meeting, EPA received the following comment letters:

- Ernest Brown & Company, *Public Comment on Preferred Alternative Waste Disposal, Inc. Superfund Site*, September 9, 1993
- Department of Toxic Substances Control, *Waste Disposal, Inc. Feasibility Study Report for Soils and Subsurface Gas*, September 9, 1993
- Water Replenishment District of Southern California, *Proposed Plan for Contaminated Soil and Subsurface Gas for Waste Disposal, Inc., Santa Fe Springs, California*, September 10, 1993
- Department of Toxic Substances Control, *Comments to Waste Disposal, Inc. Proposed Plan*, September 10, 1993
- Bear, Kotob, Ruby & Gross, *Waste Disposal Inc. in Santa Fe Springs - Superfund Site*, on behalf of Dr. Adeline Bennett, September 15, 1993
- Department of Health Services comments of the Proposed Plan, September 21, 1993
- City of Santa Fe Springs, *City of Santa Fe Springs' Comments on EPA Proposed Remediation Plan for Waste Disposal, Inc. Superfund Site*, October 8, 1993

- Albert L. Sharp, City of Santa Fe Springs Mayor Pro Tem, *Proposed Soils Remedy for the Waste Disposal, Inc. Superfund Site - Santa Fe Springs, California*, October 8, 1993
- Phil Campbell, letter of support for EPA's preferred alternative, October 29, 1993

Copies of these letters, as well as additional correspondence that relates to the comment letters EPA received during the comment period, are attached to this document as Attachment A.

The remainder of this responsiveness summary is divided into three sections. Section 2 is a summary of major issues and concerns raised by the comments and EPA's response to these concerns. Section 3 includes each written comment received and EPA's detailed response to each comment. Section 4 includes the comments received during the Public Meeting and EPA's response to them.

2.0 Summary of Responses to Major Issues and Concerns

There were several issues and comments that were brought to EPA's attention during the public comment period. Some of these were raised formally during the Public Meeting, but many were also expressed during the meeting with the parents of St. Paul High School, as well as EPA's presentation to the Santa Fe Springs City Council. As a result, EPA has committed to increased community involvement during the design process, and will solicit more comments from the community as the project progresses. The following are concerns related to the decision for the remedy.

2.1 Health Concerns and Site Risks

One of the main concerns is that of a potential health threat, both to the citizens of Santa Fe Springs and the students of St. Paul High School. As explained in the Feasibility Study and during the Public Meeting, EPA considers the site a *potential* health threat, based on assumptions made for future use of the site. The site does not currently pose a risk to nearby residents, students, or workers, since there is no activity that would expose persons to the contamination. However, if the site is opened up for development, one of the first things that would happen would be digging for foundations of buildings, in which case contaminated soil would become exposed to the atmosphere, greatly increasing the chances for human exposure. There also exists some surface contamination that trespassers could become exposed to, if they chose to cross the currently fenced site.

In order to protect the health of the community, the pathway through which the population can be exposed must be eliminated. EPA has chosen to place a

physical barrier between the community and the contaminated soils, which pose the highest risk at the WDI site. In order to keep the physical barrier protective, EPA will also implement restrictions on use of the physical barrier, or cap, so that it protects people from exposure to the contaminated soils beneath. These restrictions will be placed on any property within the site boundary where contamination exists above a health concern.

Conversely, some members of the community feel that since the site poses no current threat, nothing should be done at the site. EPA, however, feels that it is necessary to act prior to any exposure occurring. The no-action approach fails to take into account the potential threat of contaminants travelling to the groundwater. Since rainwater can leach contaminants out of the soil and into the groundwater, rainwater must be prevented from entering the soil. This is the other main goal for the cap. Leaving the site in its current condition would provide no protection.

2.2 Aesthetics and Future Land Use

Much of the interest and concern for this site concerns ultimate use of the site, and what it will look like to passers-by, students, and nearby residents. EPA has taken these concerns into account by committing to a design process that will allow for greater public involvement.

In the Proposed Plan, EPA's preferred alternative called for a multi-layered cap with an asphalt top layer over the reservoir area. However, this would not have been simply a mounded hill of black asphalt; the cap would have been designed to allow for uniform drainage, and would have changed the current topography very little. In this Record of Decision, EPA has modified the alternative somewhat by requiring a multi-layered, impermeable cap, with the final configuration determined during the design phase. Again, this will allow for greater public involvement during the design of the remedy.

The future use of the site has not yet been decided. It is hoped that EPA, the City of Santa Fe Springs, and the property owners can come to a mutually agreeable decision regarding future use of the capped property. Community input will also be solicited during the discussions of final use. EPA insists that any activity protect the integrity of the cap, and that the activity be included in the design of the final remedy. Once the cap is in place, it should not be breached. EPA recognizes that there may be cases where the cap may be breached and suitably repaired, however, EPA will discourage all but the most substantive justifications for tampering with the remedy. Any foundations or poles that need to be installed for planned future activities should be installed at the time of cap construction, so that the cap retains its protectiveness.

2.3 Effectiveness of Remedy

The other major concern of the community was the effectiveness of the remedy, or how to ensure that the remedy is protective, especially for the students of St. Paul High School. EPA is confident that the remedy will be protective, since the remedy design will follow EPA guidance established and proven by previous efforts with landfill sites. Also, with future monitoring and evaluations, EPA will ensure that the chosen remedy remains protective and effective. If the analysis of the data shows that the remedy is not performing according to expectations, and that contaminant levels are increasing or spreading, the remedy decision will be re-evaluated.

3.0 Detailed Response to Comments

3.1 Comments from Ernest Brown & Company

A. RCRA-Equivalent Cap

1. Depth of Liner: While the EPA has expressed a desire to facilitate the reuse of the property where the proposed cap is to be placed, the present cap configuration prevents viable economic use of that property. Provisions should be made to place the impermeable liner and the consolidated excavated soil at a greater depth with relation to the asphalt surface. Since the consolidated excavated (i.e., contaminated) materials lie directly under asphalt and thin membrane, there is virtually no ability to place the type of minimal subsurface foundations necessary for likely use. For instance, any RV parking or other storage uses would require a series of fence posts and lamp posts which require shallow subsurface foundations.

Response: Since the purpose of the institutional controls for the cap area is to maintain the integrity of the cap, even if the liner and contaminated soils were below placed at a greater depth with relation to the asphalt surface, there would still not be any allowable activity that would breach the cap. Since the cap is multi-layered, each component must be considered part of the whole and integral to the protection offered. One component cannot be breached and still have cap integrity maintained. As discussed in the institutional controls section of the ROD, future use plans need to be addressed during design, so that any needed foundations or post holes can be incorporated into the design and constructed during the implementation of the remedy.

2. Composition of liner: In-depth consideration should be given to substituting a one foot clay liner in lieu of the proposed flexible membrane liner now being proposed. Such a clay liner may be more durable and may

serve as an equal or superior barrier to infiltration of rainwater. The cost of a clay may also be more economical to construct. If a synthetic membrane is truly deemed the best alternative, testing and/or statistical results should be included in the ROD showing durability and longevity data on the proposed synthetic liner.

Response: EPA has considered the comment, and has decided on a performance-based standard for this remedy, rather than calling out specific materials in this Record of Decision. The Proposed Plan called for a RCRA-equivalent, impermeable, multi-layered cap (membrane liner, gravel and asphalt). This ROD requires a permeability of 10^{-7} cm/sec for the final cap configuration, with a combination of surface configurations based upon community input. That said, the replacement of a membrane liner with a clay layer is not likely, based upon the poor performance of clay layers in dry climates like Santa Fe Springs. Cracking caused by drying of the clay (desiccation) can be irreversible, opening a pathway to the contamination and nullifying the protection of the cap. During design, the final low-permeability layer/top layer configuration will be determined, with additional public input into the decision.

B. Contaminated Soils:

1. **Characterization:** If the Preferred Alternative is implemented, there should be a more complete characterization of the contaminated soils to be excavated from the former waste handling areas (e.g. areas 3, 4, 6, 7, and Toxo Spray Dust area). Upon review of the Final Remedial Investigation Report (1989), there appears to be an insufficient number of borings placed in these areas (only two borings in some areas) and insufficient laboratory analyses performed. In particular, there appears to be too little data (e.g., only 3-4 analyses in some areas) regarding the lateral and vertical extent of volatile organics, semi-volatile organics, pesticides, PCBs, and metals.

Response: The determination of the extent of excavation will be made based on on-site sampling to ensure that the excavation meets the clean-up standard established in this ROD. EPA feels that based on the RI data, as well as previous studies that outlined the extent of the sumps, the contamination in the designated areas will be removed to the levels established in this document.

2. **Movement Across Property Boundaries:** The Preferred Alternative contemplates moving contaminated soils onto the center property partly owned by the Pitts Grandchildren's Trust prior to capping. In the absence of express authorization from the Trust, this action, regardless of how logical in the macro sense or how well-intended, constitutes a trespass. The Trust

would like confirmation by the EPA that it must obtain the permission of the Trust, or take the property and pay just compensation under the 5th Amendment, prior to implementing the Preferred Alternative.

Response: EPA does not concur with the Trust's assertions. As a preliminary matter, EPA notes that the issue only arises with respect to soils that are being moved onto the Trust's property from property not owned by the Trust. Some of the contaminated soil that is being consolidated will be moved from areas that are already partially owned by the Trust. Furthermore, for several reasons, EPA does not believe that the movement of the contaminated soils from the areas not owned by the Trust would constitute a trespass or a taking.

First, EPA has broad regulatory authority under Section 104(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §9604(a), to perform such remedial action as it believes is necessary to protect human health and the environment as long as the remedial action is consistent with the National Contingency Plan. The selected remedial action at the WDI Site is a proper exercise of EPA's regulatory power to abate a public nuisance and is not a trespass or a taking. Second, EPA notes that the center property partly owned by the Trust already contains contaminated soils and, in fact, is the most contaminated portion of the entire Superfund Site. Unless a Superfund remedial action is performed, the land owned by the Trust cannot be used for any purpose and has no real market value. Thus the remedial action would not cause any diminution in the value of the property or any injury or damage to the Trust. Finally, EPA observes that the Trust, as the current owner of contaminated property at the Site, is a potentially responsible party (PRP) pursuant to Section 107(a)(1) of CERCLA, 42 U.S.C. §9607(a)(1), and is thereby jointly and severally liable for the costs of the response action. Accordingly, if the contaminated soils from the perimeter areas were transported to a disposal facility off-site, rather than being consolidated in the center property, the total cost of the response action would be significantly higher and the Trust, as a PRP, would be liable for that higher total cost.

Whether a particular action constitutes a trespass or a taking is, of course, ultimately a judicial determination. If this issue were to be litigated, EPA reserves all of its rights to present the above legal arguments and any other legal arguments that might be pertinent. However, since the Trust is a potentially responsible party, EPA will be attempting to have further discussions with the Trust in an effort to negotiate a settlement resolving the Trust's liability under CERCLA Section 122, 42 U.S.C. §9622.

C. Vegetation/Greenbelt Option

As part owners of the area which is proposed to be capped under the Preferred Alternative, the Pitts Grandchildren's Trust strenuously objects to any vegetation or greenbelt option which would make business ventures on the central property impossible. The EPA should continue its prior commitment to work hard in order to implement a remedy which allows for the maximum economic use of the property. A vegetation/greenbelt option would constitute a Taking under the 5th Amendment for which just compensation (i.e., lost profits on a yearly basis indefinitely) must be paid.

Response: The community, the property owners, and the City have expressed various concerns about the future use of the property. Some of the concerns emphasize future economic use, others emphasize safety, and still others focus on aesthetics. In the selected remedy EPA has attempted to address and balance those various competing concerns. Some of the specifics regarding the future uses of the Site will be determined during the design phase after further consultation with the interested parties.

The selected remedy contemplates some landscaped vegetation as a component of the cap. For many of the same reasons set forth in the response to the preceding comment, EPA does not believe that the landscaping would constitute a taking. As part of the remedial action, the landscaping would be a proper exercise of EPA's regulatory authority. Furthermore, since the Trust's property cannot presently be used for any business purpose, the selection of a remedy that included a greenbelt would not cause any diminution in the value of the property.

3.2 Department of Toxic Substances Control, Comments to the Feasibility Study Report for Soils and Subsurface Gas

1. The Department has in the earlier comments to the draft Feasibility Study (FS) stated that the acronyms STLCs and TTLCs were not correctly used and could mislead the reader. They are still found in certain places in the final FS to imply that if they are below STLCs and/or TTLCs, they are not hazardous. As stated in the Health & Safety Code Section 66699, STLCs/TTLCs are used to determine if any waste is hazardous waste or not (Underlined for emphasis. See the definition for waste.)

Response: EPA recognizes that the use of STLCs/TTLCs is inappropriate for the discussion of the extent of contamination. However, previous studies referred to in the FS utilized this analysis, and it would be inappropriate for EPA to alter the discussion of these previous studies. EPA also recognizes, however, that in lieu of background levels or health-based risk standards, the

comparison of a material to its concentration that determines a hazardous waste is better than simply stating the results of the sampling. Without some kind of reference or context, the values may be meaningless to many of the readers.

2. The Department is concerned with any contaminated soils left in place, regardless of the alternative selected for the final remedy. The State has regulations on land use and definitely require some form of deed restrictions placed on the main reservoir and any other areas that have contaminated soils if they do not meet the requirements for an unrestricted land use. Unrestricted land use means that the land must meet risk criteria for residential land use.

Response: The selected remedy requires an evaluation of the contamination found on each parcel, with appropriate restrictions placed on parcels can pose a health risk. Please refer to Section 10.6 of the ROD for a more detailed description of the institutional controls. The final determination of restrictions for each property will be made during negotiations in design.

3. In relation to concerns presented by the community with regards to seismic activities, the following regulations should be considered as ARARs and be taken into consideration during the design phase:

- a. CCR Title 23, Section 2547 which states that structures which control surface drainage, erosion or gas should be designed to withstand the Maximum Credible Earthquake (MCE) without damage.

- b. CCR Title 22, Section 67108 which states that cover system and containment control features should be designed to withstand the MCE without the level of public health and environmental protection afforded by the original design being decreased.

- c. CCR Title (22) 67418 which states that the cover be designed to accommodate the forces of earthquakes.

Response: EPA made a final ARARs determination in a letter to the State dated December 7, 1993. The regulations identified in parts (b) and (c) above have been repealed and are now incorporated into Title 22 CCR §66264.25 (b), which has been included as an ARAR. The regulation identified in part (a) is duplicative of the regulations in (b) and (c), so EPA does not consider it to be an ARAR.

4. The Department would like to make a few minor comments on the discussion on the risk assessment so they will reflect the current thinking on this subject:
 - a. In the 3rd paragraph of Section 1.12, the risk were based on the average (geometric mean) of the contaminant concentration. DTSC generally uses the 95% Upper Confidence Level for this value.
 - b. In Table 1-9, the age and the average weight given fits a "Student" better than an "Off-site Adult Residents".
 - c. The Dermal Absorption Factors used were lower than currently acceptable values. For example, the dermal absorption factors for the Carcinogen PAHs and PCBs were stated as 0.02 and 0.07, respectively. The values used in the DTSC Preliminary Guidance Manual (7/29/93) were 0.20 and 0.14, respectively.
 - d. In Table 1-13, the PRG for lead was indicated as 500 mg/kg. Presently acceptable levels are 130 ppm.

Response: EPA thanks the State for their comments to the Feasibility Study. In response to part (d), EPA refers to the Region IX PRGs for Fourth Quarter 1993 (November 1, 1993), which still identifies the PRG for lead, based on the Uptake Biokinetic Model, as 500 mg/kg for a residential soil exposure.

5. Section 1.6, 1st paragraph. Typo. The Groundwater Elevation Map is shown in Figure 1-4 and not in Figure 1-5 as stated in the text.

Response: The comment is correct; the figure was misidentified in the text.

3.3 Water Replenishment District of Southern California

1. The August 1993 EPA proposed plan announcement indicates that the majority of the non-disposal reservoir contaminated soils occur within 5 to 15 feet below ground surface. However, the "Preliminary Risk Assessment" prepared by the EPA contractor, Ebasco (December 1989) indicated that "The majority of subsoil contamination was detected at depths ranging from 10 to 20 feet" (Ebasco, 1989, p2-35). In addition, a review of soil sample analytical summary tables presented in the "Final Remedial Investigation Report" (Ebasco, November 1989) indicates that certain metals, volatile organic compounds, semivolatile organic compounds, pesticides, and polychlorinated biphenyls occur at potentially elevated concentrations to maximum depths of 50, 60, 60, 35, and 35 feet, respectively. We are therefore concerned that the depth of soils excavation may not be adequate

to prevent further leaching of contaminants into the ground water, particularly, if these areas remain undeveloped and are exposed to rainfall or landscape irrigation infiltration. The installation and periodic maintenance of an asphalt cap on the excavated area may limit, albeit not eliminate, this potential problem.

Response: The comment is correct that contamination exists deeper than 5-15 feet deep. EPA was trying to convey that there was little chance for exposure to surface contamination, and that most of the contamination was located at least 5-15 feet deep below the ground surface. Unfortunately, that was not how the Proposed Plan read.

2. We are concerned that certain contaminants in the existing former disposal reservoir may continue to migrate downward to the groundwater owing to the potentially high liquids content of some of the sludges that were deposited in the reservoir. The installation and periodic monitoring of a soil moisture lysimeter network adjacent to and beneath the disposal reservoir (the latter via angled borings) may alleviate this concern.

Response: EPA appreciates the commenter's concern regarding potential leaching of contaminants into the groundwater from the disposal reservoir. EPA has been monitoring the groundwater beneath the site, and will continue to monitor the groundwater until a groundwater remedy is selected. Since the site has been inactive for almost 30 years, EPA feels that once the infiltration of surface water is eliminated, the likelihood that any contaminant leaching will occur is small.

3. We are concerned that the ground water quality monitoring to be implemented as part of the proposed soil remedy is not to be considered as the final ground water remedy. To this end we intent to take an active role in reviewing and commenting upon data generated from the proposed ground water monitoring program and to work with EPA to develop groundwater protection strategies that will ensure groundwater quality in a cost-effective manner.

Response: Since EPA has not been able to determine that the WDI site is the source of contaminated shallow groundwater, EPA postponed the decision on a groundwater remedy until more data could be collected. The requirement for sampling as part of this remedy is to ensure that the selected remedy is not adversely impacting groundwater quality; it will also provide information for future groundwater actions. Also, since wastes will be left in place, sampling is a closure requirement, and is necessary for conducting five year reviews.

3.4 Department of Toxic Substances Control Comments to WDI Proposed Plan

1. **Regardless of the alternative selected as the final remedy, it is expected that some contaminated soils will be left in place at the reservoir area and some surrounding areas at the site. Up to the present, no deed restrictions have been imposed on any parcel. However, the Department would require a voluntary deed restriction be recorded to limit the use of these areas.**

Health and Safety Code Section 2522.1 authorizes a landowner to agree voluntarily to a deed restriction on the property. However, if a landowner refuses to agree to a deed restriction, EPA or the State should require the landowner to clean up the contaminated areas and restore them to residential land use.

Response: Institutional controls are part of EPA's selected remedy. During the design of the remedy, EPA hopes to negotiate appropriate restrictions for each parcel of the site. If we cannot reach an agreement on voluntary restrictions for each parcel, the State has the authority under §25220 et seq. of the Health and Safety Code to make a determination that a particular property should be designated as "hazardous waste property" or "border zone property", with subsequent restrictions imposed on those properties.

2. **The Department has determined that the design of the RCRA equivalent cap for Alternative 3C as illustrated in Figure 3 of the Proposed Plan is inadequate. Potential problems that have been identified and/or improvements that can be made are presented below:**
 - a. **The location of the consolidated excavated soils in the cap is too shallow and does not allow any buffer zone or safety factor in the event of accidental or intentional penetration; and/or cracking/breaking of the asphalt cap and flexible membrane liner. As you know, some of the proposed excavated soils are contaminated and exposure could result in health risks.**
 - b. **To minimize the exposure to the consolidated soils, it is suggested that the consolidated soil be buried as close as possible to the waste material by first removing some of the current 5-10 feet soil covering.**
 - c. **Laying the asphalt directly over the flexible membrane liner is not advisable for the following reasons:**
 - (1) **There is a possibility for the flexible membrane liner to tear should the asphalt crack or break which could occur during a major earthquake or as a result of subsidence.**

- (2) The flexible membrane liner may be damaged during installation by the heavy equipment rolling over the surface and from sharp stones lying next to the membrane liner. Generally, a layer of fine soil or sand is placed on the top and bottom of the membrane liner for protection. The soil layer also serves as a drainage layer and gas vent layer.

Response: EPA has included your recommendations in the description of the selected remedy. EPA will require that the excavated soil be placed under clean fill already located on the site. The clean surface fill will be scraped back in order to provide room for the excavated material. However, it is not advisable to expose the contaminated soil any more than necessary, so the excavated contaminated soil will be placed at least two feet below the ground surface, but will probably still remain above the unexcavated contaminated soil.

In response to the construction of the cap, EPA has decided to call out only a performance standard for the impermeable cap, so that issues like those brought up by the State will be addressed during the design of the cap. EPA recognizes that these issues are best addressed at that time.

3. DTSC does not object to a different type of cap other than that proposed in Alternative 3C, provided the remedial response objectives are maintained, i.e. "...to protect against and minimize the release of hazardous pollutants, or contaminants so that they do not migrate and cause substantial danger to present and future public health and welfare or the environment."

Response: EPA agrees that any remedy must be protective, and EPA's selected remedy will meet the remedial response objectives and be protective.

3.5 *Bear, Kotob, Ruby & Gross, on behalf of Dr. Adeline Bennett*

Dr. Bennett "would like to see a higher degree of environmentally friendly landscaping techniques employed in conjunction with the asphalt cap." She is also concerned about the degree of pollutants that may become airborne in any excavation of the perimeter properties. . . . At this time, Dr. Bennett objects to the transportation of such contaminants into a centralized collection area, as proposed. Dr. Adeline Bennett does not wish to waive any rights at this time, but stands ready to cooperate and entertain any proposal the EPA may propose.

Response: EPA intends for any landscaping that is done on the site to be environmentally sound, which will include low water consumption. We

share Dr. Bennett's concern that airborne contaminants may be released during the excavation, and will take precautions to minimize any release and the impact of the excavation to local air quality.

Dr. Bennett has stated that she objects to the consolidation of the contaminated soils in the central property. The comment does not offer a specific basis for that objection. To the extent that the objection is based on a theory that the consolidation would constitute a taking under the Fifth Amendment, EPA reiterates and incorporates by reference the response it provided above to the comment made by the Pitts Grandchildren's Trust on this issue (See Section 3.1 B). While EPA recognizes that the current property owners may object to the consolidation of contaminated properties onto the central portion of the site, that option is considered the most cost effective, and will remove contaminated soil from other parcels they own, as well as from other parties, in order to make the excavated parcels potentially useful for future development. An alternative that would leave all contaminated soils in place with a cap over the property would significantly impair the future usefulness of the various properties.

3.6 State of California Department of Health Services

1. Ensure that the cap, whether it is the proposed RCRA-equivalent cap or a clay/green cap, adequately covers the waste so that casual physical disturbance of the cap can not occur.

Response: EPA will ensure that the cap is protective and adequately prevents physical contact with the underlying contamination.

2. Ensure that the cap, whether it is the proposed RCRA-equivalent cap or a clay/green cap, adequately covers the waste so that water may not penetrate into the waste material.

Response: EPA will require that the cap meet an impermeable definition of 10^{-7} centimeters/second.

3. Ensure that the integrity of the cap can adequately withstand the strong seismic activity that has occurred in southern California and is predicted for the future.

Response: EPA has added seismic ARARs called out in the California Hazardous Waste Control Act, Title 22 CCR, §66264.25 (b), Seismic Design Standards.

4. Adequately maintain the fence in order to prevent public access to site, especially during future site disturbances when waste material is exposed.

Consider building a taller sound barrier-type fence along the side of the site adjacent to the school.

Response: During site activities, the site will be secured. In addition, a supplemental wall will be considered during design of the remedy, at which time the EPA can discuss the options with the City of Santa Fe Springs, the community, and St. Paul High School.

5. Conduct real-time air monitoring and air sampling before and during site disturbances, especially during the proposed soil excavations. Monitor and sample the air that is within the human breathing zone as well as on rooftops. Monitor for volatile organic compounds and particulate-associated compounds. Take samples during the site activities separate from samples taken during the time when no site activities are occurring. Include in the remedial design workplan a worker health and safety plan and a residential contingency plan that require certain health protective steps be taken based on the levels detected in the air monitoring and air sampling.

Response: EPA will conduct air sampling during site activities as suggested.

6. Ensure that the remedial action will involve collection and treatment of subsurface gases. The microbial production of gases other than methane may pose a long-term health concern to the employees working in the on-site buildings. Even if there is not enough methane to light a flare, another method of treatment may need to be considered.

Response: Consideration of treatment other than flaring is included in this decision, if a treatment option is required.

7. Address in the remedial design the following concern: although the waste material has not yet migrated laterally through the soil column, the addition of a cap may provide an additional force that would encourage lateral migration. If not taken into the account, the waste may surprisingly appear in the school's athletic fields or ooze through holes or cracks in the foundations of the on-site buildings.

Response: EPA will take these concerns into account during the design of the remedy to ensure that the remedy does not encourage migration of contaminated soil from under the capped area.

8. Require adequate institutional controls to ensure that there will be no penetration of the cap for development purposes. Deed restrictions that prevent digging or excavation of subsurface soils rather than a simple notice on the deed should be included as a part of the institutional controls.

Response: EPA will negotiate institutional controls with property owners that will be protective for any anticipated actions. Please refer to Section 10.8 of the ROD for a full description of the anticipated restrictions.

9. Require adequate institutional controls that prevent current owners or future owners for those commercial parcels with underlying waste material from carrying out activities which entails penetrating the subsurface soil and disturbing the waste material.

Response: EPA will negotiate institutional controls with property owners that will be protective for any anticipated actions. Please refer to Section 10.8 of the ROD for a full description of the anticipated restrictions.

10. Inspect the cap and surrounding area on a regular basis to ensure that the cap is intact, there is no spread of the waste material, and the institutional controls are working.

Response: EPA's selected remedy requires annual sampling and inspections.

11. Circulate the remedial design plan (including the worker health and safety plan and the residential contingency plan) to CDHS for public health review.

Response: EPA looks forward to working with CDHS in the future, and will provide material for their review, and endeavor to include them in any future community discussions.

3.7 City of Santa Fe Springs

1. The City's preferred alternative is to have the site completely free of contaminated soil. Implementation could be accomplished by excavating the soil and hauling it off-site for proper disposal or remediation. This solution would then allow unrestricted development of the site, and would totally alleviate any potential problems of human exposure to the contaminated soil.

Response: As explained during the Public Meeting, this alternative was evaluated by EPA and determined to be very costly for a subsequent small reduction in the long-term risks posed by the site, while increasing the short-term risks. Since the volume of contaminated materials is very large, the risks posed by them fairly low (almost within what EPA considers safe for residential use), and the estimated cost \$120 million, complete removal is not considered a feasible option.

2. If the above excavate/haul alternative is deemed cost-prohibitive, then in-situ bio-remediation of the organic and hydrocarbon constituents of the waste

should be accomplished, and the remaining metal constituents be immobilized through chemical fixation. This solution would significantly reduce potential human exposure, and the site would have less prohibitive restrictions on development.

Response: As explained during the Public Meeting, the main risk posed by this site is due to the presence of arsenic, a naturally occurring metal in California soils. Arsenic poses a cancer risk, and can be toxic or have non-cancer health effects at high levels. For soil micro-organisms, arsenic can be toxic, and will kill them when they come into contact with the contaminant. For this reason, bio-remediation is impractical for this site.

As for chemically fixing the arsenic and other metals found in the soils at the site, this process involves mixing the contaminated soil with materials to basically "cement" the metals so that they cannot leach out. The mixture that is used to "fix" the soil must be carefully determined, so treatability studies must be done to formulate the chemical mix. The fixation process cannot be done while any bio-remediation is taking place, so the treatment would have to wait until the bio-remediation is complete. The soils would be treated on-site, but would probably require excavation (unless the treatment process could be performed in-situ) and replacement once treatment was completed. Since the volume of contaminated soils is estimated at 750,000 yds³, and at a minimum, the cost of treating the soils is estimated at \$100/yd³ (from EPA technical staff estimates), the cost of this remedy would be approximately \$75 million. This process would prevent the metals from leaching into the groundwater, but would still require restrictions on future use. This same result can be achieved by EPA's selected remedy at a much lower cost.

3. With regard to the peripheral contaminated properties, the City-preferred alternative is to bio-remediate the contaminated soils or excavate these soils and haul off-site for remediation. This action would alleviate the need of transferring the contaminated soil to the reservoir grounds, and consequently would allow the site to maintain its present topographical appearance.

Response: See above comment for a discussion of bio-remediation. As for hauling excavated soils off-site, this option was evaluated, but was discarded because it raises the cost of the remedy significantly without providing appreciable, additional risk reduction. Since the area proposed for consolidation is already contaminated and includes the reservoir, the consolidation would not greatly increase the risk posed by the reservoir area. During consolidation and site grading, EPA will endeavor to maintain the site's current topographical profile, since the site is not smooth and flat at present.

4. In some places the depth of clean uncontaminated cover soil is reported to be at least 15 feet. Upon completion of remediation the site should be regraded to lower the overall height of the mound as much as possible.

Response: The current site mound height is mainly due to the presence of the old concrete reservoir, and the clean fill covering it. It would not be desirable to remove this soil cover, which would expose the disposed material in the reservoir, in order to flatten the site topography. However, every opportunity will be taken to fill in holes, and minimize the slopes on the site. But since the concrete reservoir is above the level of the street, the site will retain a higher profile than the surrounding properties.

5. Prior to the issuance of the Record of Decision the City requests that EPA establish the topographical profile of the site before and after completion of remediation. Knowing the final physical appearance of the site will assist the City in commenting on the plan as regards future development opportunities on the site.

Response: Current site profiles are available in the Final Groundwater Characterization Report of May 1989, Figures 2-7 through 2-9. A topographic map of the site can also be found, in Figure 3-2. Expected topographic profiles for the remedy can be included in the design work.

6. Prior to the issuance of the Record of Decision the City requests that EPA reveal the nature of the deed restrictions at the site upon completion of remediation and to which properties the restrictions will be applied. Knowing this will assist the City in commenting on the restrictions and perhaps recommending alternatives.

Response: As explained in Section 10.6 of this ROD, deed restrictions will be negotiated with site property owners. Specifics of the restrictions will be made at that time, but in general, will follow the outline in Section 10.8.

7. After the site is remediated we recommend that the current fencing along the northern boundary of the site (particularly along the St. Paul's High School property) be replaced with a concrete block retaining wall of sufficient height to restrict the view of the site from anywhere on the school's property, and of sufficient height to discourage students or others from climbing the wall. Furthermore, the school should be generally consulted in this matter so as to express its concerns regarding the wall's appearance and any landscaping that may be done.

Response: We have included the design option of a block wall or fence as part of the selected remedy. The exact configuration of any fence will be

determined during the design phase of this project, and will include public discussion of the issue. It may not be necessary to construct a fence, depending on the final configuration of the cap, if current trees remain after construction of the remedy.

8. EPA should place a gravel trench adjacent to St. Paul High School to act as a barrier to migration of methane gas. This is a precaution which has been required elsewhere in the City adjacent to landfills.

Response: This suggestion has been included as a design option of the remedy decision. The exact configuration and function of the trench, if any, will be determined during design.

9. In those areas where the asphalt cap is not applied and where development cannot take place (e.g., along the slope of the mound), the City requires some sort of low maintenance landscaping to reduce the possibility of unsightly weed growth.

Response: Areas that will be capped with vegetation will be landscaped to be low-maintenance. However, slopes may be paved with asphalt if that is the desired configuration of the cap. It is possible to pave on grades up to 50%.

10. EPA should better define and prepare a plan showing where and how surface water run-off from the site will be collected and disposed.

Response: The final design for the surface of the site will include uniform run-off. Surface water run-off will be directed to the storm sewers. Since the run-off will not be in contact with contaminated material, it will not be necessary to collect and dispose of it.

11. When weed abatement is permitted by EPA at the site prior to remediation, the City should be advised in advance of the work, and dust suppression should be used during the work.

Response: This has in the past been the usual operating procedure. However, EPA was not notified prior to the last weed abatement work that was performed at the request of the Fire Department of the City of Santa Fe Springs. The Los Angeles County Weed Abatement Program Project Manager was out of town when the request was received, so the work was begun without EPA notification. There should probably be only one more weed abatement prior to the implementation of the selected remedy. However, for any future weed abatement activities, better communication within the City's departments as well as with EPA will prevent further misunderstandings. As for dust suppression being used during any weed

abatement, though not necessary, may be possible, and will be discussed with the LA County Project Manager before the next abatement is begun.

12. There are numerous unmarked and unsealed barrels containing unknown substances on the site. The presence of these unmanaged barrels pose a potential fire and safety hazard, as well as a public nuisance. EPA should address the management of these barrels immediately, and not wait until remediation is under way.

Response: These containers were addressed in a letter to the City of Santa Fe Springs dated November 4, 1993. The containers were evaluated by EPA during the removal action taken in March 1988. The containers were determined to contain non-hazardous waste material that did not qualify for action under EPA removal authority. These containers will be addressed by EPA's selected remedy.

3.8 *Albert L. Sharp, Mayor Pro Tem, City of Santa Fe Springs*

"... Environmentally Safe Products Corporation (ESP) has contacted my office and made me aware of the option of using biodegradable products to promote degradation of contaminants. ESP also believes that they have environmentally safe products which could be used to fixate, in place, the non-biodegradable contaminants and to seal the surface of the site. . . . In assessing the alternatives and before selecting the final WDI clean up strategy, EPA should give further consideration to the new technologies which may be available in the marketplace. ESP represents the type of approach which may provide EPA, The City of Santa Fe Springs, and a surrounding property owners with a more cost effective and minimal risk alternative."

Response: Please see the response to the City of Santa Fe Springs comment on bio-remediation and chemical fixation. EPA contacted Environmentally Safe Products Corporation to investigate their proposal for remediating this site. The materials we received are included in this Responsiveness Summary. EPA feels that the proposal received by ESP was inadequate, and could not use it to determine the effectiveness of the proposed processes. EPA did not receive any information concerning past successes with the ESP processes, nor any participation by a regulatory agency, EPA or state. In addition, the materials EPA did receive (mainly the Material Safety Data Sheet for the soil sealer) show that the material is 100% water soluble, which would not be desired to keep water from infiltrating the soil. Since the proposal required the use of unproven technologies, its selection would require extensive treatability studies and evaluation, during which no other remedy would be implemented. EPA feels that its selected remedy is the most cost effective, protective measure currently available.

3.9 Phil Campbell

"... I am very supportive of your Number 3C proposal. I would hope that this proposal will be decided upon and initiated within a short time! ... I would appreciate it if you could give me a time frame as to when we could expect to have the contamination removed and what those specific plans are!"

Response: EPA hopes that work on the design will begin in early 1994. Once the design is underway, EPA will conduct additional public meetings to discuss the schedule and progress of the project.

4.0 Public Meeting Comments

During the Public Meeting of September 1, 1993, a court reporter was present to provide a transcript of the meeting. EPA received several questions and comments on the Proposed Plan and general site conditions. Many of these comments have already been addressed in Section 2.0 of this Responsiveness Summary, Major Issues and Concerns. EPA feels that the following comments received during the Public Meeting (page numbers are those of the transcript) warrant a specific response.

4.1 Page 24, line 3, Mr. Sharp

"...why would not the fence be moved back to the green area (*capped area on overhead*) so all the white area, which had been excavated and the impurities removed from the soil, be able to be open for development?"

Response: The area that will be capped, and the area to be excavated, are both private properties. EPA's selected remedy requires that the cap be put in place to prevent direct exposure to the contamination and prevent rainwater infiltration. The restrictions on the property require that site activity be compatible with the cap design and that cap integrity be maintained. If the owners of the properties feel that this can be met with a fence, a fence can be placed around the entire cap. However, if the property owners wish all their property fenced, that is also their option. While the excavated properties will be free from development restrictions imposed by EPA, it does not necessarily follow that the properties will actually be developed.

4.2 Page 41, Father Gallagher, Principal, St. Paul High School

"... it does strike me as a little bit strange that we already have a city government empowered to make decisions for the people within the City, but that the EPA would come in and become more restrictive than you feel that the City of Santa Fe Springs would be with our already elected officials, and you would put something--

you would force the city to comply beyond just the normal level of concern that the people who live right here in the City would already have about what is going on in the City. . . The second thing is -- it has to do with the whole idea about the word contamination is that, you know, there's a lot of parents here who have children who go to St. Paul, and when people think contamination, I think that a lot of times they're thinking about nuclear contamination, the threat of what is airborne, what is soil-born, and I was led to understand in our conversations that actually that whatever contamination there is really a metallic contamination from a very minor kind of a normal industry output like oil, sludge that was a part of what was going on here, and actually that will not ooze from one piece of property to the next piece of property without any kind of a major catastrophe."

Response: EPA's authority to respond to actual or potential environmental health risks was granted by the United States Congress under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, also known as Superfund. This law was amended in 1986 by the Superfund Amendments and Reauthorization Act (SARA). These laws give EPA authorities not granted to local governments to address environmental issues.

Concerning the word "contamination", it is an accurate term for the substances found at the WDI site. Though the materials are not nuclear in origin or pose a radiological hazard, the site is not without risk. While some of the contamination comes from a "normal industry" like the oil industry, this does not reduce the hazard to human health. Some of the contaminants found at the site are potential or known human carcinogens, while others have non-cancer health effects. We do not want to minimize the potential dangers of the substances found at the site, nor do we wish to unduly alarm people. Although current risks are small, eliminating exposure to these hazardous substances (the "contamination") will further reduce the risks posed by the site.

Lastly, EPA believes that the selected remedy will adequately contain the contamination, and that migration of the contaminated materials will not be a problem. We will monitor the site annually and evaluate the effectiveness of the chosen remedy to ensure that the selected remedy is performing to EPA expectations.

4.3 Page 48, line 22, Father Gallagher

"... I think there would be some liability on the part of the government for . . . putting in something where we would be concerned about -- I would always be concerned about well, what's happening over there which we have no control over? I would have control over who was on our property, but I wouldn't have

control over who is standing on the piece of property above us looking down at the students who are unprotected. So, you know, it's simply a question or a comment, but I do think that there'd (be) some governmental liability if something were to occur."

Response: EPA, under CERCLA, has the responsibility to protect human health and the environmental from potential and actual releases of hazardous substances. With the implementation and proper operation and maintenance of the remedy, this responsibility will be met. Since the site is located on privately owned property, any activities occurring on the site that St. Paul High School jeopardizes the safety of their students are the responsibility of the property owners. If the integrity of the remedy is compromised, the situation would warrant EPA attention. However, EPA does not assume any liability for actions taken by private parties on private property.

4.4 Page 50, line 6, Mr. Sharp

"Why wasn't bioremediation put in there as one of the alternatives? It's a method we've used successfully of cleaning up some of the oil properties in the City the City wanted to redevelop during the redevelopment agency. I don't see that listed as any type of alternative, yet it's probably the most successful method currently used throughout the world."

Response: Please refer to the previous discussions on the lack of bio-remediation options for arsenic contamination in Section 3-7, page 3-16. It was screened during the Feasibility Study and discarded due to the inability to reduce the main risk at the site.

4.5 Page 54, line 5, Mr. Cabral

"I've worked on the one (*methane flare*) in Rose Hills, and that makes a lot of noise."

Response: The amount of noise will be considered when the design of any flare is undertaken. However, with the limited amount of methane that is anticipated, any noise generated at the site should be minimal.

4.5 Page 62, line 4, Ms. Aguilar

"My comment is that. . .we have children playing out there every day hard, breathing hard, breathing that gas you're going to put up in the air hard right next to it. I'm talking a few feet from there. Why can't they just clean it? Clean it."

Response: As stated in the Public Meeting, no gases were detected at the surface of the site other than typical ambient (local) air. We are concerned that any site contaminants not impact the students, however, and will investigate treating gases that are generated at the site, if necessary. However, if the amount and types of gases that are generated are below acceptable risk standards, the gases will be emitted into the atmosphere. Any emissions will have to meet both health standards and California air quality regulations. As previously explained, the cost of removing the contaminated materials is too high for the limited amount of risk reduction ultimately achieved. Also, complete excavation of the site would increase the short-term risks to the surrounding residents and students, even while meeting all emissions standards. The additional emissions just from the trucks would be significant. At present, there aren't any known technologies that can "clean up" the site.

4.6 Page 66, Father Gallagher

"I would like to say that we are very appreciative of the work of the EPA. . . If in conjunction with the City of Santa Fe Springs, who we believe are responsible individuals elected by the members of the City, that something should be decided to be done on that property, that we would prefer that nothing would be above the level of the property in terms of business where we would have to be concerned about the safety of the students at some future date based on a decision of somebody other than us about who is going to own that property or use that property or we would want something, for example, a wall or the government to provide some kind of protection so that we would not have to be concerned about the safety of our students, so if we had a comment to make I would think that it would be that we would prefer that it not be asphalt, that it would remain exactly the way it is, and if there is absolutely no problem right now and if I could build a house there that I could live on for 70 years with no problem, well, then I would just as soon see that things be left as they are right at this moment."

Response: EPA has taken your comment into account regarding public discussion of future uses of the site, as well as having a design option for a wall or enhanced barrier between the site and St. Paul High School. As for the safety of the students being jeopardized by any activities on the site in the future, EPA cannot at present envision any such activity that would be allowed and also protect the integrity of the cap. Also, the final configuration of the cap will be decided during the design phase, and the public will be able to comment and contribute their opinions to the final appearance of the site.

4.7 Page 67, line 6, Mr. Sharp

"Along with Father Gallagher, I as a City Councilman in this City have no desire to see anything happen on that site as far as a storage yard or anything. I think every member of the EPA in this room knows how I feel about putting asphalt down. I don't want to see a black or a green mountain. As far as I'm concerned, if there's nothing wrong with the soil, why don't we just plant wild flowers over it, make it as aesthetically pleasing to the community as we possible can and let that sleeping dog lie if there's no -- all we're doing is just covering it so someone can come in and set some tractors and trucks and travel trailers and whatever else on it. No, I'm not in favor of that."

Response: As previously discussed, the final use of the property will be decided upon by EPA, the City of Santa Fe Springs, and the property owners, along with contributions by the general public. The possibility of a "green" cap has been evaluated, and the limitations of this type of cap, mainly the ease with which it can be pierced, was also presented at the Public Meeting. The final configuration for the surface of the cap will be decided upon during design, with community involvement throughout the process, and can include some "green" cover.

4.8 Page 68, line 20, Ms. Calderone

". . . my comment and concern basically goes back to seismic activity. I have children that go to St. Paul. If we have a major catastrophe -- it could be today, tomorrow, ten years from now -- my kids have to go out there on that field. Is there any warning signs, bells or something to say that, you know, there is toxic waste going out in the air, methane gas? Are they going to be exposed and harmed by this if they're out there in the field? I mean what is the limits to where they would be exposed?"

Response: EPA has included seismic requirements into the selected remedy. In the unlikely event that there is a major exposure of the contaminated materials at the site, the risks would still prove fairly small, since the highest risk from the site was long-term, direct exposure to the contamination for residents on the site. Since there are no residents living on the site, the risks are less for the students attending St. Paul High School next door.

4.9 Page 70, line 12, Mr. Calderone

"You're talking about putting the daisies and everything. Is there any way that you can put a nicer looking fence instead of barbed wire or a higher fence?"

Response: Once the remedy construction is completed, there will be no requirement for fencing the site, unless it is determined that a fence is needed to protect the cap. Otherwise, any fencing would be at the discretion of the property owners. EPA has included a block retaining wall as a design option for the remedy that may be placed between the site and St. Paul High School.

4.10 Page 72, line 4, Mr. Moreno

"And there have been reports of odors. I don't know how many people have gotten sick. There's been -- there have been those reports."

Response: EPA has had only anecdotal evidence of any odors emitted from the site in recent history (since the site was closed and covered with soil). We have also not received any notice that anyone has been made ill from the site. Since no emissions were detected at the site, we can only conclude that the site is not currently the cause of illness or source of odors. The reports referred to reports of a "gas cloud" observed after an earthquake. However, this observation was disputed by the principal of St. Paul High School as having originated at another site, upwind of WDI and the high school.

4.11 Page 74, line 1, Mr. Lazaretto

"Some work beforehand should be done to make representation of how -- how the site will look given the fact that more earth is going to be placed on top so that there's some good idea so people can make, I think, an informed decision of how it's going to look ultimately."

Response: A representation of the final appearance of the site will be made during the design phase of this project. Various options should be presented at that time for public evaluation and comment.

4.12 Page 77, line 11, Father Gallagher

"I think that some people have indicated here this evening that they're confused. If you will not take away everything that is on the property right now, why would you ever accept that we would want you to dig in some of the area that you consider contaminated and put that contaminated soil on top of five feet of soils that is not contaminated and then guarantee us that that is going to be protected by whatever you do with it when you're using the argument that it would be safer for us to not -- not to touch -- not to move it from that area at all? So that's why I think that there has to be a clarification about the word contamination because I have been led to believe that we're using the word contamination, and there is

probably a possibility of contamination on that piece of property that might not be any different than the back yard of somebody in Santa Fe Springs in some areas of contamination."

Response: EPA's selected remedy proposes moving some of the contaminated material that is more readily accessible and consolidating the contamination into a smaller area. This excavation and consolidation will be performed under carefully controlled operations to limit contact with the contaminated soils, so the workers will be exposed to minimal risks. Dust suppression will be used to protect non-workers as well. In order to provide more protection, the surface soil in the consolidation area will be partially removed in order to provide a thicker protective barrier between contaminated soils and the surface.

Although some of the contaminants found at WDI are also found in the background soils in the Santa Fe Springs area, they are found at the site at greater levels than is considered healthy. They are also found at levels higher than background, so in that respect are not like backyard soils. There are also contaminants that are not found in the background, and are present as a result of previous industrial activity at the site. The excavation will be performed to remove the contaminated soils of the sumps to the protective levels established in the Section 10.1 of the ROD.

4.13 Page 81, line 13, Brother Dennis

"My concern is that's a fairly ugly looking thing, and I obviously would be more -- the green field is obviously more pleasing to look at."

Response: Thank you for your comment. We will consider aesthetics during the design phase of this project.

4.14 Page 86, line 7, Father Gallagher

"One comment, and it would be a very brief one, is that I'd like to reiterate that the position of the school is that we'd be very reluctant to have any business up above the level of the school yard where we would have to be concerned about the safety of the students and always be wondering well, who was going to be looking down on them since -- since the field is used for a lot of different activities, so this is a different safety, so I would hope that the EPA would also allow for that if they're going to be making some kind of improvements in the area."

Response: As previously stated, final uses for the site will be determined during the design phase of this project; we will try to address concerns similar to those stated in the comment at that time.

ATTACHMENT A

WRITTEN COMMENTS

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1011 N. GRANDVIEW AVENUE
GLENDALE, CA 91201
(818) 551-2800



September 9, 1993

Mr. Rusty Harris-Bishop
U. S. Environmental Protection Agency
Region 9 - Superfund, H-7-2
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Harris-Bishop:

WASTE DISPOSAL, INC. FEASIBILITY STUDY REPORT FOR SOILS AND SUBSURFACE GAS

The Department of Toxic Substances Control (Department) has completed the review of the subject report dated August 2, 1993 and have the following general and specific comments.

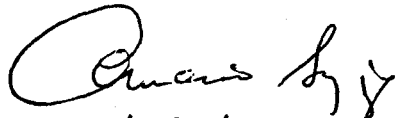
1. The Department has in the earlier comments to the draft Feasibility Study (FS) Report stated that the acronyms STLCs and TTLCs were not correctly used and could mislead the reader. They are still found in certain places in the final FS to imply that if they are below STLCs and/or TTLCs, they are not hazardous. As stated in the Health & Safety Code Section 66699, STLCs/TTLCs are used to determine if any waste is hazardous waste or not (Underlined for emphasis. See the definition for waste).
2. The Department is concerned with any contaminated soils left in place, regardless of the alternative selected for the final remedy. The State has regulations on land use and definitely require some form of deed restrictions placed on the main reservoir and any other areas that have contaminated soils if they do not meet the requirements for an unrestricted land use. Unrestricted land use means that the land must meet the risk criteria for residential land use.
3. In relation to concerns presented by the community with regards to seismic activities, the following regulations should be considered as ARARs and be taken into consideration during the design phase:
 - a. CCR Title 23, Section 2547 which states that structures which control surface drainage, erosion or gas should be designed to withstand the Maximum Credible Earthquake (MCE) without damage.
 - b. CCR Title 22, Section 67108 which states that cover system and containment control features features should be designed to withstand the MCE without the level of public health and environmental protection afforded by the original design being decreased.
 - c. CCR Title 67418 which states that the cover be designed to accommodate the forces of earthquakes.

Mr. Rusty Harris-Bishop
September 9, 1993
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4. The Department would like to make a few minor comments on the discussion on the risk assessment so they will reflect the current thinking on this subject:
 - a. In the 3rd paragraph of Section 1.12, the risk were based on the average (geometric mean) of the contaminant concentration. DTSC generally uses the 95% Upper Confidence Level for this value.
 - b. In Table 1-9, the age and the average weight given fits a "Student" better than an "Off-site Adult Residents".
 - c. The Dermal Absorption Factors used were lower than currently acceptable values. For example, the dermal absorption factors for Carcinogen PAHs and PCBs were stated as 0.02 and 0.07, respectively. The values used in the DTSC Preliminary Guidance Manual (7/29/93) were 0.20 and 0.14, respectively.
 - d. In Table 1-13, the PRG for lead was indicated as 500 mg/kg. Presently acceptable levels are 130 ppm.
5. Section 1.6, 1st paragraph. Typo. The Groundwater Elevation Map is shown in Figure 1-4 and not in Figure 1-5 as stated in the text.

If you have any questions, please call me at (818) 551-2880.

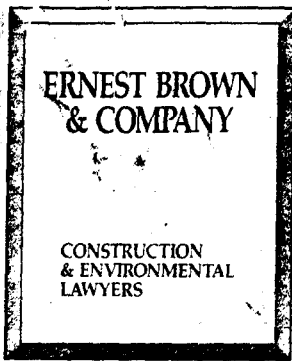
Sincerely,



Amancio Sycip
Site Mitigation Branch

cc: Hamid Saebfar
Department of Toxic Substances Control
1011 N. Grandview Avenue
Glendale, CA 91201

Dr. Lou Levy
Department of Toxic Substances Control
1011 N. Grandview Avenue
Glendale, CA 91201



Irvine

Phoenix

San Diego

San Francisco

September 9, 1993

Federal Express

Mr. Rusty Harris Bishop
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: Public Comment on Preferred Alternative
Waste Disposal, Inc. Superfund Site
Our File No.: 1353-01

Dear Mr. Harris Bishop:

On behalf of the Pitts Grandchildren's Trust, we make the following public comments with respect to the Waste Disposal, Inc. (WDI) Superfund Site:

A. RCRA-Equivalent Cap

1. Depth of Liner: While the EPA has expressed a desire to facilitate the reuse of the property where the proposed cap is to be placed, the present cap configuration prevents viable economic use of that property. Provision should be made to place the impermeable liner and the consolidated excavated soil at a greater depth with relation to the asphalt surface. Since the consolidated excavated (i.e., contaminated) materials lie directly under asphalt and thin membrane, there is virtually no ability to place the type of minimal subsurface foundations necessary for likely use. For instance, any RV parking or other storage uses would require a series of fence posts and lamp posts which require shallow subsurface foundations.
2. Composition of Liner: In-depth consideration should be given to substituting a one foot clay liner in lieu of the proposed flexible membrane liner now being proposed. Such a clay liner may be more durable and may serve as an equal or superior barrier to infiltration of rainwater. The cost of a clay may also be more economical to construct. If a synthetic membrane is truly deemed the best alternative, testing and/or statistical results should be including in

8001 Irvine Center Drive Suite 900 Irvine, California 92718-2921

Telephone (714) 727-0559 Facsimile (714) 727-0656

Mr. Rusty Harris Bishop
US EPA
September 9, 1993
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the ROD showing durability and longevity data on the proposed synthetic liner.

B. Contaminated Soils

1. Characterization: If the Preferred Alternative is implemented, there should be a more complete characterization of the contaminated soils to be excavated from the former waste handling areas (e.g. areas 3, 4, 6, 7, and Toxo Spray Dust area). Upon review of the Final Remedial Investigation Report (1989), there appears to be an insufficient number of borings placed in these areas (only two borings in some areas) and insufficient laboratory analyses performed. In particular, there appears to be too little data (e.g., only 3-4 analyses in some areas) regarding the lateral and vertical extent of volatile organics, semi-volatile organics, pesticides, PCBs, and metals.
2. Movement Across Property Boundaries: The Preferred Alternative contemplates moving contaminated soils onto the center property partly owned by the Pitts Grandchildren's Trust prior to capping. In the absence of express authorization from the Trust, this action, regardless of how logical in the macro sense or how well-intended, constitutes a trespass. The Trust would like confirmation by the EPA that it must obtain the permission of the Trust, or take the property and pay just compensation under the 5th Amendment, prior to implementing the Preferred Alternative.

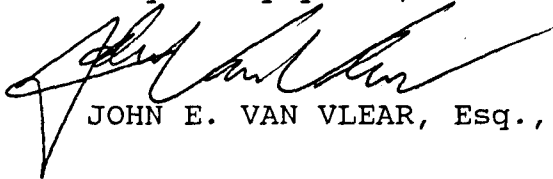
C. Vegetation/Greenbelt Option

As part owners of the area which is proposed to be capped under the Preferred Alternative, the Pitts Grandchildren's Trust strenuously objects to any vegetation or greenbelt option which would make business ventures on the central property impossible. The EPA should continue its prior commitment to work hard in order to implement a remedy which allows for the maximum economic use of the property. A vegetation/greenbelt option would constitute a Taking under the 5th Amendment for which just compensation (i.e., lost profits on a yearly basis indefinitely) must be paid.

Mr. Rusty Harris Bishop
US EPA
September 9, 1993
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We appreciate your time and energy in addressing these important points and look forward to the written responses.

Very truly yours,



JOHN E. VAN VLEAR, Esq., R.E.A.

JVV:dlh

cc: Pitts Grandchildren's Trust
Lewis C. Maldonado, Esq. (EPA)

135701\Corresp\Bishop.C01

September 10, 1993

Mr. Rusty Harris-Bishop
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Subject: Proposed Plan for Contaminated Soil and Subsurface Gas
for Waste Disposal, Inc., Santa Fe Springs, California

Dear Mr. Harris-Bishop:

The Water Replenishment District of Southern California (WRD) appreciates the opportunity to submit comments for your consideration in response to the proposed soil remedy to be performed by the United States Environmental Protection Agency (EPA) at the Waste Disposal, Inc., site.

WRD is a special district established under the California Water Code. WRD manages the groundwater in the Central and West Coast Groundwater Basins of Los Angeles County, which provide a portion of the water supply to approximately 3.5 million people in a service area that covers 420 square miles in southern Los Angeles County. The Waste Disposal, Inc., site is located within the Central Basin. As you can appreciate, sources of contamination that threaten groundwater supplies are of major concern to WRD.

It is our understanding that the proposed soil and soil gas remedy includes the excavation of variously contaminated soils in the vicinity of the former 42 million gallon disposal reservoir, placing and compacting these soils on top of the former reservoir and capping the combined wastes with a flexible plastic membrane liner and an asphalt surface seal. The implied intent of double liner construction over the waste pile would be to minimize infiltration of rainwater and potential leaching of contaminants into the ground water and to protect the public from direct or airborne exposure to surface contaminants. A gas collection/venting system with possible treatment is also proposed to reduce organic gas emissions associated with the decomposition of some of the waste constituents.

We further understand that ground water monitoring would be required under the proposed soils remedial plan to evaluate the effectiveness of this remedy relative to the potential migration of certain waste pile contaminants to the ground water.

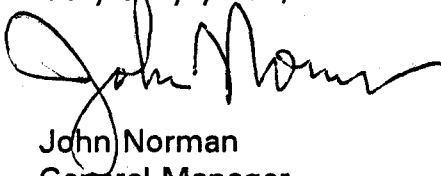
The WRD is generally in concurrence with the proposed plan. However, there are several concerns that we have regarding ground water protection:

1. The August 1993 EPA proposed plan announcement indicates that the majority of the non-disposal reservoir contaminated soils occur within 5 to 15 feet below ground surface. However the "Preliminary Risk Assessment" prepared by the EPA contractor, Ebasco (December 1989) indicated that "The majority of subsoil surface soil contamination was detected at depths ranging from 10 to 20 feet." (Ebasco, 1989, p2-35). In addition, a review of soil sample analytical summary tables presented in the "Final Remedial Investigation Report" (Ebasco, November 1989) indicates that certain metals, volatile organic compounds, semivolatile organic compounds, pesticides, and polychlorinated biphenyls occur at potentially elevated concentrations to maximum depths of 50, 60, 60, 35, and 35 feet, respectively. We are therefore concerned that the depth of soils excavation may not be adequate to prevent further leaching of contaminants into the ground water, particularly, if these areas remain undeveloped and are exposed to rainfall or landscape irrigation infiltration. The installation and periodic maintenance of an asphalt cap on the excavated area may limit, albeit not eliminate, this potential problem.
2. We are concerned that certain contaminants in the existing former disposal reservoir may continue to migrate downward to the ground water owing to the potentially high liquids content of some of the sludges that were deposited in the reservoir. The installation and periodic monitoring of a soil moisture lysimeter network adjacent to and beneath the disposal reservoir (the latter via angled borings) may alleviate this concern.
3. We are concerned that the ground water quality monitoring to be implemented as part of the proposed soil remedy is not to be considered as the final ground water remedy. To this end we intent to take an active role in reviewing and commenting upon data generated from the proposed ground water monitoring program and to work with EPA to develop groundwater protection strategies that will ensure groundwater quality in a cost-effective manner.

Mr. Rusty Harris-Bishop
September 10, 1993
Page 3

We look forward to working with you and your staff in the remediation of the Waste Disposal, Inc., site. Should you have any questions, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "John Norman", written over the typed name.

John Norman
General Manager

cc: Central Basin Water Association
Southeast Water Coalition
Harold Morgan (Bookman-Edmonston Engineering)
Tom Regan (Bookman-Edmonston Engineering)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, Ca. 94105-3901**

November 4, 1993

**Robert G. Orpin
Director of Planning and Development
City of Santa Fe Springs
11710 Telegraph Road
Santa Fe Springs, CA 90670-3658**

**RE: Comments on EPA's Proposed Plan for the Waste Disposal, Inc.
Superfund Site**

Dear Mr. Orpin:

I would like to thank you for submitting the City of Santa Fe Springs comments to EPA's Proposed Plan for the Waste Disposal, Inc. (WDI) Superfund Site, located in your city. Most of your comments will be addressed in the Responsiveness Summary of the Record of Decision (ROD), which should be completed by early December; however, there were a couple of items in your comment letter that I wanted to address prior to the issuing of the ROD. I also wanted to reiterate some of EPA's thoughts on future land use of the site, especially since City input will greatly affect the amount of creative thinking involved in determining and allowing for compatible uses of the site.

Comment 12, which requested EPA action on numerous barrels located on the southeast area of the site, has been addressed. These barrels were identified in 1988 by EPA as non-hazardous and not posing an imminent threat to human health or the environment, and therefore did not qualify for a removal action under EPA's removal action authority. I have spoken with Steve Koester of your Fire Department, as well as George Baker of the Los Angeles County Fire Department, and understand that there were oily petroleum products in some of the barrels, and that some appeared to be leaking. Petroleum products are not considered hazardous under federal regulations, but may be considered so under state regulations. The Santa Fe Springs Fire Department has covered the barrels with plastic, and that should prevent any further releases. The owner of the property is having the materials evaluated, and he will presumably take care of the disposal of the barrels. If not, these barrels will be taken care of during the Remedial Action. I have included the summary of the On-scene Coordinator's report from EPA's initial actions at the site. If further action is required, EPA may be able to send someone down to examine the facility and re-evaluate the hazards.

Mr. Robert G. Orpin
Director of Planning and Development
November 4, 1993
Page 2

As for the weed abatement (Comment 11), the last effort was initiated at the request of the Santa Fe Springs Fire Department. While I am usually informed prior to the disking operations, it is not required, since EPA has determined that the disking does not pose a health threat to the community (mowing tends to create more dust, since it actually pulls dirt and dust up into the blades, and then directs it away from the mower). However, it would be desirable for the operation to suppress any excess dust, so I will make that suggestion to the LA County Weed Abatement Project Manager, Grace Murase. It is unfortunate that there was a complaint from a parent from St. Paul High School; the proposal to provide dust suppression during excavation for the remedy has been confused with dust suppression for the site in general. I explained the situation to Santa Fe Springs Fire Marshall Stan Betcher, and he feels comfortable with the decisions made, and will be able to provide information to any concerned citizens should this issue come up again.

As for your other comments, most will be addressed in the Responsiveness Summary of the ROD. Comments 4 and 10, though, will be addressed during the Remedial Design phase. For Comments 5, I would like to refer you to the Final Remedial Investigation Report, Volume I, Chapter 3. This chapter shows the topographical profile of the site and several cross-sections. A final topographical profile for the site will not be made until the design is completed.

Deed restrictions (Comment 6), as explained in the Proposed Plan, will be placed on the area where the cap will be constructed, in order to maintain the integrity of the remedy. In addition, restrictions will be placed on each parcel where the risk of contact with contaminated soil exists. These restrictions can be as simple as a voluntary notice on the deed that contamination exists under the property. If the property owners are not cooperative with EPA in placing the voluntary restrictions, the State may declare the property a hazardous waste property, which carries with it more severe use restrictions. A City zoning ordinance could also be used to restrict use of properties where there is underlying contamination, if desired. These decisions will be made during the design phase as well, since the ROD will describe only the requirements and actions that will be taken, with the specifics left for the Remedial Design. EPA hopes to restrict property use as little as possible, but will do what is necessary to prevent exposure to contamination existing at the site.

I would like to close by discussing some of the ideas EPA has come up with concerning future land use at the site. While EPA's selected remedy will be protective, we feel that we have a unique opportunity to be very creative in terms of future land use, and that we should expand our thinking to include other uses of the cap. Since restrictions that will be placed on the cap will not allow piercing the cap for

October 29, 1993

Rusty Harris-Bishop
U.S. EPA 75 Hawthorne St.
San Francisco, CA 94105

Dear Mr. Harris-Bishop:

This letter is in regards to your request for some public input to your several alternatives of concluding the investigation and remedial proposals of the Waste Disposal Inc. Superfund site.

I am very supportive of your Number 3C proposal. I would hope that this proposal will be decided upon and initiated within a short time!

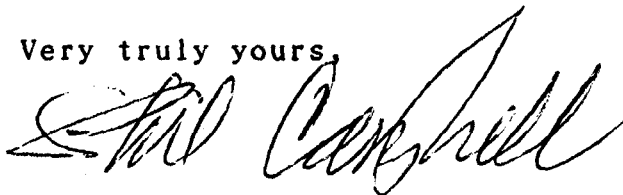
As you know every other property within the bounds of the Superfund has been able to operate as though there were no restrictions on these individual properties. My particular piece of real estate does have limited contamination, and is under direct EPA authority as what can be done to establish it as a viable piece of property that can be developed.

I would appreciate it if you could give me a time frame as to when we could expect to have the contamination removed and what those specific plans are!

I would also like to work with you to establish the guilt of the parties that contaminated the property. I have been involved with the city in the possible selling of this property for development since 1982. As you can see many frustrating years have elapsed since the initial undertaking of the development of this property. Anything you can do to hasten an end to this long and bureaucratic experience would be certainly welcomed and appreciated.

I am 65 years old, and looking forward to having this piece of property developed before I die! Please endeavor to help me obtain my goal!!

Very truly yours,

A handwritten signature in black ink, appearing to read "Phil Campbell", written in a cursive style.

Phil Campbell



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

November 4, 1993

Mr. Albert L. Sharp, Mayor Pro-Tempore
City of Santa Fe Springs
11710 Telegraph Road
Santa Fe Springs, CA 90670-3658

RE: Waste Disposal, Inc. Superfund Site

Dear Mr. Sharp:

I would like to thank you for your letter of October 8, 1993 concerning the Proposed Plan for the Waste Disposal, Inc. (WDI) Superfund Site. I appreciate the information you provided both in the letter, and in our meeting of October 18, 1993. I am enthusiastic to develop a closer working relationship with the City so that we can develop a creative solution to the interesting issues posed by the WDI Superfund Site.

I have responded to the official City of Santa Fe Springs comment letter via separate correspondence (on which you are copied), but I wanted to thank you personally for your interest and activities concerning this site. I hope that I will be able to meet with the City Council again and discuss some of EPA's ideas regarding future use of the site, so that we can come to a mutually agreeable decision prior to the Remedial Design phase of the project.

Again, thank you for your concern and interest in this site. I look forward to working with you and your fellow council members in the near future.

Sincerely,

A handwritten signature in black ink, appearing to read "Rusty Harris-Bishop".

Rusty Harris-Bishop

cc: Lewis Maldonado (RC-3-1)
Dan Opalski (H-7-2)

Mr. Robert G. Orpin
Director of Planning and Development
November 4, 1993
Page 3

building or construction, any construction ideas would need to be discussed and included in the Remedial Design. From our meetings with the public, both at the public meeting and with the parents from St. Paul High School, we know that development of the site for use as a vehicle storage area is not desirable. However, there could be other uses for the asphalt surface, including tennis courts, basketball courts, or other recreational uses. EPA is willing to work with the City and the current property owners to develop some future use scenarios, but this will need to be done during design. Our ROD will most likely call for a hybrid cap, with an asphalt cap over the reservoir, and a soil and vegetation cap over the remainder of the contaminated area. We think that with the participation of the City, the property owners, the community, and EPA, we can develop a plan for use that will be beneficial to all concerned, and still maintain the integrity of the remedy and the protection required by our remedy. Again, I want to stress that EPA is very willing to work with the City in coming up with a viable use for the property that will be acceptable to all concerned parties; however, we need to have a plan in place so that we can design it into the remedy. If we cannot incorporate the future use ideas into the design, the cap restrictions will prevent any activity from taking place in the future.

I look forward to working with you on this site, and hope that we can come up with a creative, innovative solution to the problems posed by this Superfund site.

Sincerely,

Rusty Harris-Bishop
Remedial Project Manager

Enclosure

cc: Mayor and City Council of Santa Fe Springs (5 copies)
Don Powell, Santa Fe Springs City Manager
N. Schnabel, Santa Fe Springs Fire Chief
James Nishida, LA County Fire Department
Dan Opalski (H-7-2)
Lewis Maldonado (RC-3-2)

The Waste Disposal Incorporated Site
Santa Fe Springs, California

I. Summary of Events

The Waste Disposal Incorporated (WDI) Site is located at the intersection of Greenleaf Ave. and Los Nietos Road in the City of Santa Fe Springs, California. The site is rectangular in shape and approximately five (5) acres in size. The site is bounded to the north by a scrap metal dealer and a heat treating operation, to the east by Greenleaf Ave., to the south by Los Nietos Rd. and to the west by a lumber yard and several other small businesses. A private school is located within one block of the site.

From the 1940's through the mid 1960's the site served as a disposal facility that accepted drilling, refinery, milling and brewery wastes. The site was later capped with two feet of clean soil and currently listed on the EPA's National Priority List for remedial action.

In February 1988 Remedial Project Manager (RPM) John Kemmerer requested that the Emergency Response Section (ERS) conduct a preliminary assessment of the WDI site in order to determine the following:

- the nature and degree of hazard associated with approximately 200 drums stored on site
- the need to restrict access to the property

On March 2, 1988, the EPA/TAT Response Team arrived on site to conduct the assessment. During the course of the assessment, it was determined that the drums in question were either empty or contained non hazardous materials and would not qualify for a removal action.

Upon completion of the drum assessment, site access control options were considered.

Details of the day's activities are discussed in the TAT report dated March 15, 1988.

On March 3-4, 1988 the results of the assessment were discussed with RPM John Kemmerer and Betsy Curnow, Chief of the Enforcement Programs Section. As a result of these meetings it was agreed that:

- no action would be taken with respect to the drums of non-hazardous material.

**Environmentally
Safe Products™**
CORPORATION

ESP
CORP

December 6, 1993

Environmental Protection Agency
75 Hawthorne Street H-7-2
San Francisco, CA 94105

Attention: Mr R. Harris-Bishop

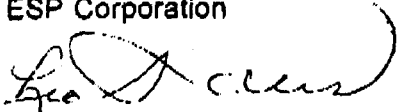
Dear Sir:

Surfaceal, ESP Corporation's trade name, was originally formulated to seal concrete and other road base materials, including the sand utilized in making concrete.

It has been approved by the United States Department of Agriculture for use in certain food establishments and by the Environmental Protection Agency for the treatment of concrete where potable water is involved.

Additional information will be furnished on request.

Very truly yours,
ESP Corporation



Leo Sanders
Executive Vice President

2100 Road to Six Flags East
Arlington, TX 76011
(817) 275 5533
FAX (817) 275 1311

Mailing & Shipping Address:

2100 Road to Six Flags East
Arlington, TX 76011

ESP Corporation

Environmentally Safe Products Corporation

Phone: 817-275-5533

Metro: 817-265-1803

Fax: 817-275-1311

MATERIAL SAFETY DATA SHEET**Surfaceal***Non-toxic Environmental Sealant***SECTION I: MANUFACTURER / EMERGENCY CONTACT**

ESP Corporation, 2100 Road to Six Flags East, Arlington, TX 76011

Emergency Phone: 817-275-5533

Information Phone: 817-275-5533

Date Prepared: 4/6/93

SECTION II: HAZARDOUS INGREDIENTS / IDENTITY INFORMATION

Ingredient: None

TLV: None

SECTION III: PHYSICAL / CHEMICAL CHARACTERISTICS

Boiling Point (Degrees F)	230°F.
Vapor Pressure	N/A
Vapor Density	N/A
Specific Gravity	1.30-1.56 @ 20°C.
Melting Point	N/A
Evaporation Rate	N/A
Solubility in Water	100%
Appearance and Odor	N/A
pH	8.1

SECTION IV: FIRE AND EXPLOSION HAZARD DATA

Flash Point	None	Extinguishing Media	N/A
Flammable Limits	N/A	Special Fire Fighting	None
Lower Explosive Limit	N/A	Unusual Fire & Explosion	None
Upper Explosive Limit	N/A		

SECTION V: REACTIVITY DATA

	Stable	Conditions To Avoid
Stability	Stable	None
Incompatibility (Materials to Avoid)	Mineral acids, organic acids, non-ferrous metals.	
Hazardous Decomposition or Byproducts	None	
Hazardous Polymerization	Will not occur	None

MATERIAL SAFETY DATA SHEET (MSDS)

Surfaceal - Page 2

SECTION VI: HEALTH HAZARD DATA

Route(s) of Entry:

Inhalation	No
Ingestion	Yes
Skin	Yes
Health Hazards (Acute & Chronic):	None

Carcinogenicity Information:

NTP	No
IARC Monographs	No
OSHA Regulated	No

Signs & Symptoms of Exposure	N/A
Medical Conditions Generally Aggravated by Exposure	None Known
Emergency & First Aid Procedures	In case of contact with skin, flush with water. In case of contact with eyes, wash with clean water (DO NOT USE EYEWASH SOLUTION).

SECTION VII: PRECAUTIONS FOR SAFE HANDLING AND USE

Steps to be taken in case material is released or spilled	Flush area thoroughly with water.
Waste Disposal Method	Mix with 20 parts water & dispose in ordinary drain.
Storing & Handling Precautions	Material will freeze at 0°F.
Other Precautions	Material will adhere to aluminum and glass

SECTION VIII: CONTROL MEASURES

Respiratory Protection	Not required
------------------------	--------------

Ventilation:

Local Exhaust	Acceptable
Mechanical	Acceptable
Protective Gloves	Rubber or Plastic
Protective Clothing	Not Required
Work/Hygienic Practices	Normal
Special	Not Required
Other	Not Required
Eye Protection	Goggles
Conditions to Avoid	None

All statements, information and data provided in this Material Safety Data Sheet are believed to be accurate and reliable. They are presented without guarantee, warranty or responsibility of any kind, expressed or implied on our part. Users should make their own investigations to determine the suitability of the information or products for their particular purpose. Nothing contained herein is intended as permission, inducement or recommendation to violate any laws or to practice any invention covered by existing patents.

Environmentally
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Corporation

ESP
Corp

PROJECT "SANTA FE SPRINGS"

The leaching and vaporization of contaminants on the site described into the environment (which includes adjacent rhizospheres and water tables), can only be accomplished by methods which involve "bond breaking", "complexing" and "bonding" of molecular structures.

These methods insure short-term and long-term reduction of migration and mobility of hazardous materials while long-term decomposition and degrading is being accomplished naturally by soil microbes.

We suggest that through a "piping" process, the "floor" of the waste area be saturated with a non-toxic siliceous formula which will bond the small particles short-term while long-term degradation by enhanced soil microbes is taking place.

The stages would be:

- a. Injection of ESP624 (a siliceous complexing liquid) into the lowest strata of the contaminated area. This injection will prevent at least 96% of any possible leaching of contaminants.
- b. Inoculation of ESP2001 microbes and enzymes into the soil area at 100 gallons per acre. This inoculation of a self-supporting "biomass" will naturally "break bonds" of various molecules and complex atoms of toxic products so that they cannot leach.
- c. Laying ESP624 on top of this layer of contaminated soil to separate the biological sandwich.
- d. Building of a "soil rhizosphere" which will cover the inoculated area, and inoculating this soil addition with ESP2001.

The technology involved in this is the forming of natural zeolites, microbial degradation, and immobilized enzymes. Short term protection is afforded by zeolite formation. Long term protection is afforded by microbial degradation and bond-breaking.

Mr. Rusty Harris-Bishop
United State Environmental Protection Agency
October 8, 1993
Page 2

**EPA's Preferred Alternative -
RCRA Equivalent Asphalt Cap w/Limited Excavation**

- Comment 4: In some places the depth of clean uncontaminated cover soil is reported to be at least 15 feet. Upon completion of remediation the site should be regraded to lower the overall height of the mound as much as possible.
- Comment 5: Prior to the issuance of the Record of Decision the City requests that EPA establish the topographical profile of the site before and after completion of remediation. Knowing the final physical appearance of the site will assist the City in commenting on the plan as regards future development opportunities on the site.
- Comment 6: Prior to the issuance of the Record of Decision the City requests that EPA reveal the nature of the deed restrictions at the site upon completion of remediation and to which properties the restrictions will be applied. Knowing this will assist the City in commenting on the restrictions and perhaps recommending alternatives.
- Comment 7: After the site is remediated we recommend that the current fencing along the northern boundary of the site (particularly along the St. Paul's High School property) be replaced with a concrete block retaining wall of sufficient height to restrict the view of the site from anywhere on the school's property, and of sufficient height to discourage students or others from climbing the wall. Furthermore, the school should be generally consulted in this matter so as to express its concerns regarding the wall's appearance and any landscaping that may be done.
- Comment 8: EPA should place a gravel filled trench adjacent to St. Paul High School to act as a barrier to migration of methane gas. This is a precaution which has been required elsewhere in the City adjacent to landfills.
- Comment 9: In those areas where the asphalt cap is not applied and where development cannot take place (e.g., along the slope of the mound), the City requires some sort of low maintenance landscaping to reduce the possibility of unsightly weed growth.

Mr. Rusty Harris-Bishop
United State Environmental Protection Agency
October 8, 1993
Page 3

- Comment 10: EPA should better define and prepare a plan showing where and how surface water run-off from the site will be collected and disposed.
- Comment 11: When weed abatement is permitted by EPA at the site prior to remediation, the City should be advised in advance of the work, and dust suppression should be used during the work.
- Comment 12: There are numerous unmarked and unsealed barrels containing unknown substances on the site. The presence of these unmanaged barrels pose a potential fire and safety hazard, as well as a public nuisance. EPA should address the management of these barrels immediately, and not wait until remediation is under way.

The City of Santa Fe Springs appreciates this opportunity to comment on the proposed remediation plan for the Waste Disposal, Inc. Superfund site. We look forward to working closely with EPA to finalize this plan to the mutual benefit of all those concerned, and to the beginning of remediation. Should you have any questions regarding our comments, please call.

Sincerely,


ROBERT G. ORPIN
Director of Planning & Development

cc: City Council
Don Powell, City Manager
N. Schnabel, Fire Chief
Andy Lazzaretto, Redevelopment Consultant
Andrea R. Abdullah, Environmental Coordinator
Dave Klunk, Environmental Protection Specialist, Fire Dept.

Rusty Harris-Bishop

September 21, 1993

11. Circulate the remedial design plan (including the worker health and safety plan and the residential contingency plan) to CDHS for public health review.

We appreciate the opportunity to provide our comments on the proposed plan for contaminated soil and subsurface gas at Waste Disposal, Inc. site. If further clarification is required, please contact myself at (510) 540-3657.

Sincerely,



Marilyn C. Underwood, Ph.D.
Associate Toxicologist
Environmental Health
Investigations Branch

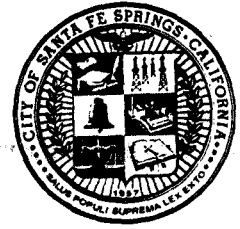
cc: Ms. Gwen Eng
Regional Representative
Agency for Toxic Substances and Disease Registry
75 Hawthorne Street, H-1-2
San Francisco, CA 94105

Ms. Gail Godfrey
Technical Project Officer
Agency for Toxic Substances and Disease Registry
Department of Health Assessment and Consultation
1600 Clifton Road, NE, E-32
Atlanta, GA 30333



CITY OF SANTA FE SPRINGS

11710 TELEGRAPH ROAD, 90670-3658 - P.O. BOX 2120 - (310) 868-0511 - FAX (310) 868-7112



October 8, 1993

Mr. Rusty Harris-Bishop (H-7-2)
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Subject: City of Santa Fe Springs' Comments on EPA Proposed Remediation Plan for
Waste Disposal, Inc. Superfund Site

Dear Mr. Harris-Bishop:

The purpose of this letter is to communicate the City of Santa Fe Springs' comments on the EPA proposed remediation plan for the Waste Disposal, Inc. Superfund site. We have reviewed the summary of the plan, and have attended the Public Meeting held by EPA on September 1. We appreciate your presentation of the plan to the City Council on August 26.

General

Comment 1: The City's preferred alternative is to have the site completely free of contaminated soil. Implementation could be accomplished by excavating the soil and hauling it off-site for proper disposal or remediation. This solution would then allow unrestricted development of the site, and would totally alleviate any potential problems of human exposure to the contaminated soil.

Comment 2: If the above excavate/haul alternative is deemed cost-prohibitive, then in-situ bio-remediation of the organic and hydrocarbon constituents of the waste should be accomplished, and the remaining metal constituents be immobilized through chemical fixation. This solution would significantly reduce potential human exposure, and the site would have less prohibitive restrictions on development.

Comment 3: With regard to the peripheral contaminated properties, the City-preferred alternative is to bio-remediate the contaminated soils or excavate these soils and haul off-site for remediation. This action would alleviate the need of transferring the contaminated soil to the reservoir grounds, and consequently would allow the site to maintain its present topographical appearance.

Al Fuentes, Mayor • Albert L. Sharp, Mayor Pro-Tempore

City Council

Mercedes A. Diaz • Ronald S. Kernes • Betty Wilson

City Manager

Don Powell

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY

BERKELEY, CA 94704-1011

(510) 540-3657



September 21, 1993

Rusty Harris-Bishop
Remedial Project Manager
U.S. Environmental Protection Agency
75 Hawthorne Street (H-7-2)
San Francisco, CA 94105

Dear Mr. Harris-Bishop:

This letter is in response to your request for comments on the proposed plan that addresses contaminated soils and subsurface gases at the Waste Disposal, Inc. site in Santa Fe Springs California. The California Department of Health Services (CDHS), under cooperative agreement with the Federal Agency for Toxic Substances and Disease Registry (ATSDR), is currently preparing a Site Review and Update document (SRU) on this site as a follow-up to ATSDR's Preliminary Health Assessment for Waste Disposal, Inc. released November 15, 1988. The SRU will be forwarded to you for review and comment after it has undergone ATSDR's review process in Atlanta.

Staff from CHDS toured the perimeter of the Waste Disposal, Inc. site on March 1, 1993 and June 23, 1993. On September 1, 1993, Marilyn C. Underwood and Jane Riggan from CDHS, accompanied by yourself and U.S. EPA Community Relations Coordinator Angeles Herrera, toured the former reservoir area. These site visits and a review of documents related to the Waste Disposal, Inc. site resulted in the items listed below, which we would like to bring to your attention.

We support U.S. EPA's choice of capping in place as described in the Feasibility Study Report of August 2, 1993, and further discussed at the community meeting of September 1, 1993. However we have several recommendations for the remedial design phase:

1. Ensure that the cap, whether it is the proposed RCRA-equivalent cap or a clay/green cap, adequately covers the waste so that casual physical disturbance of the cap can not occur.
2. Ensure that the cap, whether it is the proposed RCRA-equivalent cap or a clay/green cap, adequately covers the waste so that water may not penetrate into the waste material.
3. Ensure that the integrity of the cap can adequately withstand the strong seismic activity that has occurred in southern California and is predicted for the future.

Rusty Harris-Bishop

September 21, 1993

4. Adequately maintain the fence in order to prevent public access to site, especially during future site disturbances when waste material is exposed. Consider building a taller sound barrier-type fence along the side of the site adjacent to the school.

5. Conduct real-time air monitoring and air sampling before and during site disturbances, especially during the proposed soil excavations. Monitor and sample the air that is within the human breathing zone as well as on rooftops. Monitor for volatile organic compounds and particulate-associated compounds. Take samples during the site activities separate from samples taken during the time when no site activities are occurring. Include in the remedial design workplan a worker health and safety plan and a residential contingency plan that require certain health protective steps be taken based on the levels detected in the air monitoring and air sampling.

6. Ensure that the remedial action will involve collection and treatment of subsurface gases. The microbial production of gases other than methane may pose a long-term health concern to the employees working in the on-site buildings. Even if there is not enough methane to light a flare, another method of treatment may need to be considered.

7. Address in the remedial design the following concern: although the waste material has not yet migrated laterally through the soil column, the addition of a cap may provide an additional force that would encourage lateral migration. If not taken into the account, the waste may surprisingly appear in the school's athletic fields or ooze through holes or cracks in the foundations of the on-site buildings.

8. Require adequate institutional controls to ensure that there will be no penetration of the cap for development purposes. Deed restrictions that prevent digging or excavation of subsurface soil rather than a simple notice on the deed should be included as a part of the institutional controls.

9. Require adequate institutional controls that prevent current owners or future owners for those commercial parcels with underlying waste material from carrying out activities which entails penetrating the subsurface soil and disturbing the waste material.

10. Inspect the cap and surrounding area on a regular basis to ensure that the cap is intact, there is no spread of the waste material, and the institutional controls are working.

LAW OFFICES
BEAR, KOTOB, RUBY & GROSS
A PROFESSIONAL CORPORATION
10841 PARAMOUNT BOULEVARD, SUITE 302
DOWNEY, CALIFORNIA 90241-3396

MAILING ADDRESS:
POST OFFICE BOX 747
DOWNEY, CALIFORNIA 90241-0747
TELEPHONE (310) 923-1207 OR 923-9836
FACSIMILE (310) 923-9792

September 15, 1993

Environmental Protection Agency
Harris-Bishop
75 Hawthorne Street (H-1-1)
San Francisco, California 94105

Re: Waste Disposal Inc. in Santa Fe Springs - Superfund Site

Dear Mr. Harris-Bishop:

I am writing this letter on behalf of Dr. Adeline Bennett, one of the landowner's concerned with the Santa Fe Springs clean-up projection. Thank you again for taking the time to explain the details of your proposals and giving her personal attention.

After extensive discussions with Dr. Bennett she wanted me to send this communication on to you to advise you that she is in agreement with your basic concept. She has a few suggestions concerning the aesthetics. She would like to see a higher degree of environmentally friendly landscaping techniques employed in conjunction with the asphalt cap.

Dr. Bennett is concerned about the degree of pollutants that may become airborne in any excavation of the perimeter properties which we are informed contain degrees of arsenic, burillium, chromium and other toxins. Digging up, loading, transporting and unloading hundreds of truck loads of dirt contaminated with these toxins would by necessity release some of them into the air. At this time, Dr. Bennett objects to the transportation of such contaminates into a centralized collection area, as proposed. Dr. Adeline Bennett does not wish to waive any rights at this time, but stands ready to cooperate and entertain any proposal the EPA may propose.

Environmental Protection Agency
September 15, 1993
Page 2

If you have any further questions concerning this matter,
please do not hesitate to call.

Very truly yours,

BEAR, KOTOB, RUBY & GROSS
A Professional Corporation

By 

GARY L. ANCOTTI

GLA/lch

cc: Dr. Adeline Bennett

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1011 N. GRANDVIEW AVENUE
GLENDALE, CA 91201
(818) 551-2800



September 10, 1993

Mr. Rusty Harris-Bishop
U. S. Environmental Protection Agency
Region 9 - Superfund, H-7-2
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Harris-Bishop:

COMMENTS TO WASTE DISPOSAL, INC. PROPOSED PLAN

The Department of Toxic Substances Control (Department) has completed the review of the subject plan and has the following formal comments.

1. Regardless of the alternative selected as the final remedy, it is expected that some contaminated soils will be left in place at the reservoir area and some surrounding areas at the site. Up to the present, no deed restrictions have been imposed on any parcel. However, the Department would require a voluntary deed restriction be recorded to limit the use of these areas.

Health and Safety Code Section 2522.1 authorizes a landowner to agree voluntarily to a deed restriction on the property. However, if a landowner refuses to agree to a deed restriction, EPA or the State should require the landowner to clean up the contaminated areas and restore them to residential land use.

2. The Department has determined that the design of the RCRA equivalent cap for Alternative 3C as illustrated in Figure 3 of the Proposed Plan is inadequate. Potential problems that have been identified and/or improvements that can be made are presented below:

- a. The location of the consolidated excavated soils in the cap is too shallow and does not allow any buffer zone or safety factor in the event of accidental or intentional penetration; and/or cracking/breaking of the asphalt cap and flexible membrane liner. As you know, some of the proposed excavated soils are contaminated and exposure could result in health risks.

- b. To minimize the exposure to the consolidated soils, it is suggested that the consolidated soil be buried as close as possible to the waste material by first removing some of the current 5-10 feet soil covering.

Mr. Rusty Harris-Bishop
September 10, 1993
Page 2

c. Laying the asphalt directly over the flexible membrane liner is not advisable for the following reasons:

- (1). There is a possibility for the flexible membrane liner to tear should the asphalt crack or break which could occur during a major earthquake or as a result of subsidence.
 - (2). The flexible membrane liner may be damaged during installation by the heavy equipment rolling over the surface and from sharp stones lying next to the membrane liner. Generally, a layer of fine soil or sand is placed on the top and bottom of the membrane liner for protection. The soil layer also serves as a drainage layer and gas vent layer.
3. DTSC does not object to a different type of cap other than that proposed in Alternative 3C, provided the remedial response objectives are maintained, i. e. "...to protect against and minimize the release of hazardous pollutants, or contaminants so that they do not migrate and cause substantial danger to present and future public health and welfare or the environment".

If you have any questions, please contact me at (818) 551-2880.

Sincerely,

Amancio Sycip
for Amancio Sycip
Site Mitigation Branch

cc: Hamid Saebfar
Department of Toxic Substances Control
1011 N. Grandview Avenue
Glendale, CA 91201

NATION-WIDE



ALL AMERICA CITY
AWARD WINNER



CITY OF SANTA FE SPRINGS

11710 TELEGRAPH ROAD, 90670-3658 - P.O. BOX 2120 - (310) 868-0511 - FAX (310) 868-7112

October 8, 1993

Rusty Harris-Bishop (H-7-2)
U.S. EPA, 75 Hawthorne St.
San Francisco, CA 94105

**SUBJECT: Proposed Soils Remedy for the Waste Disposal, Inc. Superfund Site -
Santa Fe Springs, California**

Dear Mr. Harris-Bishop:

After reviewing the proposed plan for dealing with the contaminated soil and subsurface gas at the Waste Disposal, Inc. (WDI) site, and attending the community meeting at the Santa Fe Springs Library on September 1, 1993, it has come to my attention that there is an alternate remediation strategy available which the U.S. Environmental Protection Agency (EPA) should consider. As a result of the publicity surrounding the WDI project, Environmentally Safe Products Corporation (ESP) has contacted my office and made me aware of the option of using biodegradable products to promote degradation of contaminants. ESP also believes that they have environmentally safe products which could be used to fixate, in place, the non-biodegradable contaminants and to seal the surface of the site. If the representations made by ESP are correct, the cost to treat the WDI site, both in economic and physical terms could be significantly reduced.

In assessing the alternatives and before selecting the final WDI clean up strategy, EPA should give further consideration to the new technologies which may be available in the marketplace. ESP represents the type of approach which may provide EPA, the City of Santa Fe Springs and a surrounding property owners with a more cost effective and minimal risk alternative.

Please continue to keep me informed as you make progress on this project. I am very anxious to learn of your reaction to my comments.

Sincerely,

Albert L. Sharp
Mayor Pro Tem

CC: Mayor and City Council
Donald Powell, City Manager

Al Fuentes, Mayor • Albert L. Sharp, Mayor Pro-Tempore

City Council

Mercedes A. Diaz • Ronald S. Kernes • Betty Wilson

City Manager

Don Powell

**Environmentally
Safe Products-
Corporation**

ESP
Corp

Fax Fax Fax Fax Fax

Mailing & Shipping Address:
2100 Road to Six Flags E.
Arlington, TX 76011

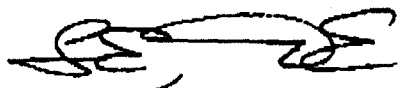
Phone: 817-275-5533
Metro: 817 265-1903
Fax: 817-275-1311

To:	Mr. Rusty Harris-Bishop	Fax No:	415/744-1917
Company:	Environmental Protection Agency	No of pages including this page:	2
From:	Leo Sanders	Date:	October 18, 1993
Subject:	Project "Santa Fe Springs"		

Per our telephone conversation this afternoon, I am forwarding to you the one-page Santa Fe Springs information that we discussed. I will have the additional information sent to you this week.

Please call if you have any questions.

Best regards,



Leo Sanders/Dale English

Environmentally
Safe Products
Corporation

ESP
Corp

PROJECT "SANTA FE SPRINGS"

The leaching and vaporization of contaminants on the site described into the environment (which includes adjacent rhizospheres and water tables), can only be accomplished by methods which involve "bond breaking", "complexing" and "bonding" of molecular structures.

These methods insure short-term and long-term reduction of migration and mobility of hazardous materials while long-term decomposition and degrading is being accomplished naturally by soil microbes.

We suggest that through a "piping" process, the "floor" of the waste area be saturated with a non-toxic siliceous formula which will bond the small particles short-term while long-term degradation by enhanced soil microbes is taking place.

The stages would be:

- a. Injection of ESP624 (a siliceous complexing liquid) into the lowest strata of the contaminated area. This injection will prevent at least 96% of any possible leaching of contaminants.
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- d. Building of a "soil rhizosphere" which will cover the inoculated area, and inoculating this soil addition with ESP2001.

The technology involved in this is the forming of natural zeolites, microbial degradation, and immobilized enzymes. Short term protection is afforded by zeolite formation. Long term protection is afforded by microbial degradation and bond-breaking.

Environmentally
Safe Products-
Corporation

ESP
Corp

Fax Fax Fax Fax Fax

Mailing & Shipping Address:
2100 Road to Six Flags E.
Arlington, TX 76011

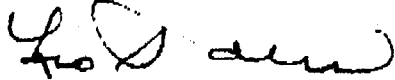
Phone: 817-275-5533
Metro: 817-265-1903
Fax: 817-275-1311

To:	Mr. R. Harris-Bishop	Fax No:	(415) 744-1917
Company:	EPA	No of pages including this page:	5
From:	Leo Sanders	Date:	December 6, 1993
Subject:	SURFACEAL		

Mr. Harris-Bishop:

The following information is for your review per your request.

Best regards,



Leo Sanders

15 Mar. 88

TAT submits report covering the preliminary assessment of the W.D.I. Site.

21 Mar. 88

TAT submits report covering fence specifications.

Action Memo approved by Jeff Zelikson.

Delivery Order issued to Riedel Environmental Services Inc.

24 Mar. 88

OSC Lewis and TAT Member Len Marcus meet on-site with Larry Boyle, Response Manager with Crosby and Overton and two potential fence sub-contractors.

28 Mar. 88

Two fence bids submitted to Crosby and Overton.

Fence sub-contractor selection made.

30 Mar. 88

Fence construction begins.

20 Apr. 88

All site fence keys turned over to Betsy Curnow.

27 Apr. 88

Fence Construction completed.

TAT submits final project report.

D. Contractor

This project was carried out by Crosby and Overton, a sub-contractor to Riedel Environmental Services Inc., the Zone 4 Emergency Response Cleanup Services (ERCS) contractor.

In general I would rate the performance of the contractor as "good".

III. Problems

None

IV. Recommendations

None

TRANSCRIPT FROM PUBLIC MEETING
VERBAL COMMENTS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9 WASTE DISPOSAL, INC.

SUPERFUND SITE PROPOSED PLAN PUBLIC MEETING

**CERTIFIED
COPY**

GOLDING COURT REPORTERS

TAKEN AT: 11710 TELEGRAPH ROAD
SANTA FE SPRINGS, CALIFORNIA 90670

DATE/TIME: WEDNESDAY, SEPTEMBER 1, 1993
7:10 P.M. - 9:00 P.M.

REPORTER: KAREN M. KLEIN
CSR NO. 5368, RPR/CM

JOB NO.: 93-1311

GOLDING COURT REPORTERS

CERTIFIED SHORTHAND REPORTERS

17785 CENTER COURT DRIVE, SUITE 440

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APPEARANCES

**FROM UNITED STATES
ENVIRONMENTAL PROTECTION
AGENCY:**

**ANGELES HERRERA
DAN OPALSKI
RUSTY HARRIS-BISHOP
LEWIS MALDONADO**

**FROM CALIFORNIA
ENVIRONMENTAL PROTECTION
AGENCY:**

AMANCIO SYCIP

1 SANTA FE SPRINGS, CALIFORNIA, WEDNESDAY, SEPTEMBER 1, 1993

2 7:10 P.M.

3 * * *

4
5 MS. HERRERA: MAY I HAVE YOUR ATTENTION, PLEASE? WE
6 WOULD LIKE TO GET STARTED.

7 GOOD EVENING, EVERYONE. MY NAME IS
8 ANGELES HERRERA, AND I WORK WITH THE UNITED STATES
9 ENVIRONMENTAL PROTECTION AGENCY IN SAN FRANCISCO. I AM
10 THE COMMUNITY RELATIONS COORDINATOR FOR WASTE DISPOSAL,
11 INCORPORATED SUPERFUND SITE KNOWN AS W.D.I. I WOULD LIKE
12 TO THANK YOU ALL FOR ATTENDING OUR MEETING THIS EVENING.
13 AS YOU CAN HEAR, ENGLISH IS NOT MY PRIMARY LANGUAGE SO
14 PLEASE DON'T HESITATE TO STOP ME AT ANY TIME IF I'M TALKING
15 TOO FAST OR IF I MISPRONOUNCE ANY WORDS.

16 (SPEAKS IN SPANISH.)

17 E.P.A. IS HERE TONIGHT TO PRESENT ITS PROPOSED
18 PLAN FOR CONTAMINATED SOIL AND SUBSURFACE GASES AT WASTE
19 DISPOSAL. WE'RE ALSO HERE TO ANSWER YOUR QUESTIONS AND TO
20 TAKE YOUR COMMENTS. I HOPE YOU ALL GOT A CHANCE TO PICK UP
21 A COPY OF OUR FACT SHEET ON THE WAY IN IF YOU DID NOT
22 RECEIVE ONE IN THE MAIL. ALSO, I WANT TO APOLOGIZE. WE
23 JUST FOUND OUT THIS MORNING THAT SOME OF THEM WERE NOT
24 COMPLETE. APPARENTLY, OUR CONTRACTOR MADE A MISTAKE AND
25 SENT OUT SOME FACT SHEETS INCLUDING TWO OF THE FIRST PAGE

1 AND THE MIDDLE PAGES WERE NOT INCLUDED, SO IF YOU RECEIVED
2 AN INCOMPLETE COPY, PLEASE FEEL FREE TO PICK UP A COMPLETE
3 COPY AT THE END -- ON THE TABLE AT THE END OF THE MEETING.

4 WE ALSO HAVE A PACKAGE WITH THE AGENDA AND THE
5 OVERHEADS. WE'D ASK YOU TO PLEASE PICK UP A COPY OF THIS
6 BECAUSE THIS WILL BE VERY HELPFUL FOR YOU TO FOLLOW THE
7 PRESENTATION.

8 AND WE HAVE A SIGN-IN SHEET. WE'RE ASKING YOU TO
9 SIGN THOSE SHEETS SOMETIME THIS EVENING, AND THE REASON WE
10 HAVE THE SIGN-IN SHEET IS BECAUSE THAT'S OUR PRIMARY SOURCE
11 TO UPDATE OUR MAILING LIST, SO IF WE DON'T HAVE YOUR NAME
12 IN THE MAILING LIST, IT'S EXTREMELY IMPORTANT FOR YOU TO
13 SIGN THE SHEET, SO WE WILL PUT YOU ON THE MAILING LIST AND
14 YOU WILL RECEIVE FURTHER INFORMATION.

15 NOW I WOULD LIKE TO INTRODUCE RUSTY
16 HARRIS-BISHOP, E.P.A.'S PROJECT MANAGER FOR
17 THE SITE; DAN OPALSKI, E.P.A. SECTION CHIEF FOR THE SITE;
18 LEWIS MALDONADO, E.P.A.'S ATTORNEY, AND WE ALSO HAVE THE
19 STATE E.P.A. COUNTERPART, AMANCIO SYCIP, CALIFORNIA E.P.A.
20 WE HAVE A TOXICOLOGIST FOR THE CALIFORNIA DEPARTMENT OF
21 HEALTH SERVICES. HER NAME IS MARILYN UNDERWOOD. WE ALSO
22 HAVE THEIR COMMUNITY RELATIONS COORDINATOR, JANE RIGGAN.

23 AS YOU NOTICE, WE HAVE A COURT REPORTER WITH US
24 THIS EVENING. SHE'S HERE TONIGHT TO RECORD THE ENTIRE
25 MEETING, AND THEN SHE WILL WRITE OUT A TRANSCRIPT OF THE

1 MEETING. THIS TRANSCRIPT WILL BECOME A PART OF THE
2 DOCUMENT THAT WILL DOCUMENT THE DECISION THAT E.P.A. WILL
3 MAKE. THIS DOCUMENT IS CALLED THE RECORD OF DECISION.

4 WE NEED YOU TO SPEAK LOUD, TO STATE YOUR NAME AND
5 AFFILIATION FOR THE RECORD, AND SHE WILL STOP YOU IF SHE
6 DOESN'T GET YOUR NAME, AND WE ASK YOU TO PLEASE SPELL IT
7 FOR HER.

8 LET ME MAKE SURE OF TELLING YOU EVERYTHING I
9 SHOULD BE TELLING YOU.

10 NOW I'M GOING TO TAKE A MINUTE TO RUN THROUGH
11 TONIGHT'S AGENDA. FOLLOWING THE INTRODUCTION, WE WILL BE
12 HEARING FROM DAN OPALSKI, WHO WILL BE COVERING THE
13 SUPERFUND PROCESS IN GENERAL. THEN RUSTY -- AND THAT'S
14 GOING TO TAKE APPROXIMATELY FIVE MINUTES, AND THE REASON
15 WE'RE PUTTING TIME TO EVERY AGENDA ITEM IS BECAUSE WE NEED
16 TO BE OUT OF HERE BY NINE O'CLOCK, BUT WE WANT TO MAKE SURE
17 THAT WE ANSWER ALL YOUR QUESTIONS, BUT THE MAIN REASON OF
18 HAVING THIS MEETING IS TO TAKE YOUR COMMENTS, AND THE COURT
19 REPORTER IS ONLY GOING TO BE HERE UNTIL NINE O'CLOCK, SO WE
20 MAY HAVE TO STOP THE QUESTIONS TO GO INTO THE COMMENTS
21 BECAUSE WE WANT TO MAKE SURE WE TAKE ALL YOUR COMMENTS, AND
22 THEN IF IT'S NINE O'CLOCK AND WE NEED TO STAY LONGER TO
23 ANSWER YOUR QUESTIONS, WE WILL BE GLAD TO DO IT OUTSIDE THE
24 ROOM.

25 THEN RUSTY WILL BE TALKING ABOUT -- HE WILL BE

1 PRESENTING OUR PROPOSED PLAN, AND HE WILL ALSO BE COVERING
2 THE DIFFERENT ALTERNATIVES THAT ARE BEING CONSIDERED FOR
3 THE SITE, AND THAT'S GOING TO TAKE APPROXIMATELY 15
4 MINUTES, SO IN TOTAL, THE WHOLE PRESENTATION WILL PROBABLY
5 BE LIKE 20, 25. THEN WE'RE GOING TO HAVE A QUESTION AND
6 ANSWER SESSION. DURING THIS QUESTION AND ANSWER SESSION,
7 WE ENCOURAGE YOU TO ASK ANY QUESTIONS OR ANY ADDITIONAL
8 CLARIFICATION YOU MAY NEED REGARDING E.P.A.'S PROPOSED PLAN
9 OR ANYTHING YOU HEAR TODAY OR IF YOU HAD A CHANCE TO REVIEW
10 OUR FEASIBILITY STUDY AND YOU HAVE ANY QUESTIONS REGARDING
11 OUR FEASIBILITY STUDY, YOU CAN ASK THOSE QUESTIONS DURING
12 THE QUESTION AND ANSWER SESSION. THEN WE WILL -- AND
13 THAT'S PROBABLY GOING TO BE LIKE HALF AN HOUR.

14 THEN WE WILL HAVE THE FORMAL COMMENT PERIOD.
15 DURING THE FORMAL COMMENT PERIOD, E.P.A. WILL NOT BE
16 ANSWERING TO THOSE COMMENTS TONIGHT. WE WILL ANSWER TO
17 THOSE COMMENTS ON THE RESPONSIVENESS SUMMARY, WHICH IS ALSO
18 A DOCUMENT THAT BECOMES A PART OF THE RECORD OF DECISION.
19 ONCE AGAIN, WE WILL NOT ANSWER TO THOSE COMMENTS TONIGHT,
20 SO IF YOU HAVE A QUESTION THAT YOU WANT AN ANSWER TONIGHT,
21 YOU SHOULD ANSWER THAT -- YOU SHOULD ASK THAT QUESTION
22 DURING THE QUESTION AND ANSWER SESSION, BUT IF YOU HAVE A
23 COMMENT, A SUGGESTION OR A THOUGHT FOR US TO CONSIDER
24 DURING -- DURING THIS COMMENT PERIOD FOR THE RECORD OF
25 DECISION, PLEASE DO THAT DURING THE FORMAL COMMENT PERIOD.

1 WITH THAT, I WOULD LIKE TO TURN IT OVER TO
2 DAN OPALSKI. THANK YOU

3 MR. OPALSKI: GOOD EVENING. I'M GOING TO TAKE JUST A
4 COUPLE OF MINUTES, AS ANGELES SAID, TO TALK GENERALLY ABOUT
5 THE SUPERFUND PROCESS TO BRING EVERYBODY UP TO SORT OF A
6 COMMON LEVEL OF UNDERSTANDING ABOUT WHAT SUPERFUND IS ALL
7 ABOUT. SUPERFUND IS THE WORD COMMONLY USED TO REFER TO THE
8 COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND
9 LIABILITY ACT THAT WAS ORIGINALLY PASSED BY THE U.S.
10 CONGRESS BACK IN 1980. UNDER SUPERFUND, E.P.A. HAS THE
11 AUTHORITY AND THE RESPONSIBILITY TO RESPOND TO HAZARDOUS
12 WASTE SITES AROUND THE COUNTRY. THESE SITES CAN FALL IN
13 THE CATEGORY OF PLACES WHERE WE NEED TO RESPOND ON AN
14 EMERGENCY BASIS, WHETHER THINGS LIKE SPILLS OR DANGEROUS
15 AND IMMEDIATE THREATS TO HUMAN HEALTH; TWO: SITES WHERE
16 THERE NEEDS TO BE SOME LONG-TERM EVALUATION, MUCH MORE LIKE
17 THE CURRENT SITUATION AT THE FORMER WASTE DISPOSAL SITE.
18 FOR THE SITES THAT GO THROUGH THIS LONGER TERM RESPONSE,
19 WHAT WE TEND TO REFER TO AS A PIPELINE, THERE ARE THE STEPS
20 THAT ARE PROVIDED HERE ON THIS OVERHEAD, AND I'LL GO
21 THROUGH EACH OF THOSE REAL BRIEFLY.

22 FIRST STEP IS SITE DISCOVERY. THAT'S ESSENTIALLY
23 THE WAY IN WHICH E.P.A. BECOMES AWARE OF THE SITE. THAT
24 CAN HAPPEN BECAUSE A COMMUNITY MEMBER CALLS UP, IT CAN
25 HAPPEN BECAUSE WE HEAR FROM A LOCAL FIRE DEPARTMENT, IT

1 COULD HAPPEN BECAUSE WE HEAR FROM A LOCAL OR COUNTY OR
2 STATE ENVIRONMENTAL AGENCY. IN THE CASE OF WASTE DISPOSAL,
3 BOTH THE CITY AND THE STATE WERE INVOLVED IN THIS SITE AND
4 BROUGHT IT TO OUR ATTENTION. ONCE A SITE HAS BEEN BROUGHT
5 TO OUR ATTENTION, THERE'S A PRELIMINARY AMOUNT OF DATA
6 COLLECTION THAT GOES ON. THAT IS GEARED TOWARDS FINDING
7 OUT ABOUT THE BACKGROUND OF THE SITE, FINDING OUT GENERALLY
8 WHAT KINDS OF CHEMICALS ARE FOUND AT THE SITE AND GETTING A
9 FIRST SENSE FOR HOW -- HOW HIGH THE CONCENTRATION OF THOSE
10 CONTAMINANTS MIGHT BE IN THE AREA. ALL THAT IS PUT TO WORK
11 IN THE -- WHAT IS SHOWN HERE AS THE N.P.L. RANKING OR
12 LISTING. WHAT HAPPENS IS THERE'S A MODEL THAT IS USED TO
13 DETERMINE WHETHER OR NOT THE CONDITIONS AT THE SITE MEET
14 ENOUGH OF A THRESHOLD TO MAKE THAT SITE WORTHY OF THE
15 EXPENDITURE OF OR ELIGIBLE FOR THE EXPENDITURE OF FEDERAL
16 CLEANUP DOLLARS. THAT HAPPENED FOR THE W.D.I. SITE BACK IN
17 JULY 1987 AS IT'S SHOWN HERE.

18 WE MOVE INTO A LONG STUDY PHASE. WE TRY IDEALLY
19 TO BE LOOKING AT ABOUT AN 18 MONTH PERIOD DURING WHICH WE
20 DO A REMEDIAL INVESTIGATION, FEASIBILITY STUDY. THAT
21 PROCESS OBVIOUSLY HAS TAKEN LONGER HERE AT THE W.D.I. SITE,
22 BUT WHAT THAT IS IS A PROCESS WHERE WE FIRST TRY TO
23 CHARACTERIZE THE NATURE AND EXTENT OF THE CONTAMINATION.
24 AGAIN, WE'RE TRYING TO DEFINE MORE DEFINITELY WHAT ARE WE
25 SEEING OUT THERE, WHAT ARE THE CONCENTRATIONS, WHAT ARE THE

1 POTENTIAL PATHWAYS FOR EXPOSURE THAT TEND TO THREATEN OR
2 MIGHT THREATEN PUBLIC HEALTH OR THE ENVIRONMENT. THAT'S IN
3 THE REMEDIAL INVESTIGATION STAGE. DURING THE FEASIBILITY
4 STUDY THEN, WE'RE LOOKING AT OKAY, WE'VE DEFINED THE
5 PROBLEM, HOW CAN WE RESPOND TO IT, WHAT KINDS OF
6 TECHNOLOGIES ARE APPROPRIATE FOR ADDRESSING THE KINDS OF
7 CONDITIONS THAT WE'RE SEEING AT THE SITE. SO IN THE
8 FEASIBILITY STUDY, WE TAKE THOSE TECHNOLOGIES, WE PUT THEM
9 TOGETHER TO FORM REMEDIAL ALTERNATIVES, WE EVALUATE THOSE
10 ALTERNATIVES AGAINST ONE ANOTHER, AND WE COME UP WITH A
11 PREFERRED OR A PROPOSED REMEDY. WE -- WE PUBLISH THAT
12 PREFERRED OR PROPOSED PLAN IN A FACT SHEET USUALLY LIKE THE
13 ONE THAT YOU HAVE RECENTLY RECEIVED IN THE MAIL OR YOU'VE
14 PICKED UP TONIGHT, AND THAT PUTS US INTO THE PUBLIC COMMENT
15 PERIOD THAT YOU SHOW HERE -- THAT IS SHOWN HERE.

16 DURING THE PUBLIC COMMENT PERIOD, THE COMMUNITY
17 HAS THE OPPORTUNITY TO LOOK AT THE FULL RECORD, NOT JUST
18 THE PROPOSED PLAN AND THE REMEDIAL INVESTIGATION
19 FEASIBILITY STUDY BUT ALL THE RECORDS THAT E.P.A. HAS PUT
20 INTO AN ADMINISTRATIVE RECORD FILE TO FORM THE BASIS FOR
21 MAKING A DECISION. A COPY OF THAT ADMINISTRATIVE RECORD
22 FILE IS HERE IN THIS LIBRARY.

23 AFTER THE PUBLIC COMMENT PERIOD, WE ARE -- WE ARE
24 REQUIRED TO CONSIDER ALL SIGNIFICANT COMMENTS, TO
25 INCORPORATE THEM INTO A RESPONSIVENESS SUMMARY AND TO

1 DOCUMENT OUR FINAL DECISION IN THE RECORD OF DECISION.
2 THAT RECORD OF DECISION, AGAIN, WOULD BE HERE IN THE
3 LIBRARY AVAILABLE FOR EVERYONE'S REVIEW, AND THERE, AS
4 ANGELES SAID EARLIER TONIGHT, YOU WOULD HAVE THE
5 OPPORTUNITY TO LOOK AT THE RESPONSES TO THE OFFICIAL
6 COMMENTS YOU MAKE, EITHER TONIGHT OR IN WRITING SUBMITTED
7 TO OUR AGENCY.

8 AFTER THE RECORD OF DECISION, WE MOVE INTO A
9 REMEDIAL DESIGN AND REMEDIAL ACTION STEP, WHICH IS -- WHICH
10 IS, FIRST OF ALL, THE DRAWING OF THE TECHNICAL
11 SPECIFICATIONS FOR THE ACTUAL WORK THAT WILL BE REQUIRED
12 AND THEN THE ACTUAL CONSTRUCTION OR OTHER ACTIVITY THAT IS
13 REQUIRED AT THE SITE TO SECURE IT TO MAKE SURE THAT THE
14 REMEDY IS PROTECTIVE. OKAY? THAT IS SUPERFUND IN A REAL
15 QUICK, GENERAL WAY. ACTUALLY, WE COULD TAKE A COUPLE OF
16 QUESTIONS IF THERE'S ANYTHING THAT'S UNCLEAR AT THIS POINT
17 OR WE CAN MOVE RIGHT INTO RUSTY'S PRESENTATION, BUT I WANT
18 TO STOP FOR A SECOND IF THERE'S ANYTHING THAT IS UNCLEAR AT
19 THIS POINT. OKAY?

20 RUSTY?

21 MR. HARRIS-BISHOP: THANKS, DAN.

22 OKAY. I'M RUSTY HARRIS-BISHOP, AS ANGELES SAID,
23 AND I'M GOING TO BE PRESENTING THE ALTERNATIVES THAT E.P.A.
24 HAS LOOKED AT, E.P.A.'S PROPOSED ALTERNATIVE AND ALSO SOME
25 OF THE INVESTIGATIONS AND THE CONTAMINATION THAT WE FOUND

1 TO DATE AND A LITTLE BIT OF THE BACKGROUND OF THE SITE.

2 AND WHILE I'D LIKE TO PROBABLY WAIT FOR MOST OF
3 THE QUESTIONS, YOU KNOW, AT THE END, IF I SAY SOMETHING
4 THAT PEOPLE DON'T UNDERSTAND OR YOU'RE NOT FOLLOWING ME,
5 PLEASE STOP ME, LET ME KNOW SO I CAN CLEAR IT UP, SO WE
6 CAN, YOU KNOW, KEEP THE PRESENTATION MOVING SO EVERYONE CAN
7 UNDERSTAND.

8 AS DAN SAID, THE SITE WAS INITIALLY PLACED ON THE .
9 N.P.L. IN 1987, AND WHEN WE PLACED IT ON, THIS IS THE
10 BOUNDARY IS THIS DASHED LINE. IT WAS BASICALLY THE
11 PROPERTY FROM SANTA FE SPRINGS ROAD TO GREENLEAF AVENUE AND
12 LOS NIETOS ROAD TO THE EDGE OF THE FEDCO PROPERTY AND THE
13 ST. PAUL'S HIGH SCHOOL PARKING LOT AND ATHLETIC FIELDS.

14 THE MAIN FOCUS OF THE DISPOSAL ACTIVITIES THAT
15 WENT ON WHEN THE SITE WAS OPERATING WAS THIS CONCRETE
16 DISPOSAL RESERVOIR, AND IT WAS ABOUT A 42 MILLION GALLON
17 CONTAINER ORIGINALLY USED FOR STORING CRUDE OIL FROM THE
18 WELL FIELDS AROUND HERE. AS THE WELL FIELDS STARTED TO
19 PRODUCE LESS, IT WAS CONVERTED TO OR THEY STARTED USING IT
20 FOR DRILLING MUDS AND SLUDGES FROM THE OIL FIELD INDUSTRY.
21 DURING THE PROCESS OF OPERATING IT FROM ABOUT 1929 TO 1964,
22 THEY OPERATED -- THEY ACCEPTED A LOT OF DIFFERENT KINDS OF
23 WASTE, SLUDGES FROM INDUSTRIAL PROCESSES, CONSTRUCTION
24 DEBRIS, CONCRETE. THEY ALSO DUG SOME PITS TO KIND OF
25 SOLIDIFY ANY OF THE LIQUIDS OR SLUDGES THAT WERE IN THAT

1 RESERVOIR AND EVENTUALLY USED A LOT OF THIS AREA IN THIS
2 BOUNDARY FOR DISPOSAL.

3 SO IT EVENTUALLY CLOSED IN THE EARLY '60'S, AND
4 THEN THEY BROUGHT IN A LOT OF SOIL AND GRADED IT OVER TO
5 BASICALLY ITS CURRENT CONFIGURATION THAT IT'S IN TODAY.

6 E.P.A. BECAME INVOLVED IN THE SITE IN 1986, '87,
7 BUT THERE WERE SEVERAL INVESTIGATIONS PRIOR TO THAT THAT
8 DID SOME CURSORY ENVIRONMENTAL INVESTIGATIONS AND ALSO SOME
9 GEOTECHNICAL LIKE STRUCTURAL STUDIES TO SEE WHAT KIND OF
10 BUILDINGS THE SITE COULD HOLD, THAT KIND OF THING, BUT
11 MOSTLY E.P.A. RELIED ON THE DATA THAT WAS COLLECTED DURING
12 THE REMEDIAL INVESTIGATION THAT WENT ON THROUGH '88 AND
13 '89, AND THAT'S THE BASIS OF THE FEASIBILITY STUDY THAT WAS
14 PUBLISHED IN AUGUST OF THIS YEAR.

15 WE STUDIED THREE DIFFERENT MEDIA. WE LOOKED AT
16 GROUNDWATER CONTAMINATION, SOIL CONTAMINATION AND
17 SUBSURFACE GAS CONTAMINATION. NOW, SUBSURFACE GAS
18 CONTAMINATION IS BASICALLY THE METHANE THAT IS A PROBLEM
19 THROUGHOUT THIS AREA BECAUSE OF THE OIL FIELD AND THE OIL
20 THAT'S LOCATED HERE. AS IT DEGRADES, METHANE IS GENERATED,
21 AND IT GENERALLY COMES TO THE SURFACE SLOWLY AND JUST
22 EVAP -- JUST GOES OUT AND DISSIPATES INTO THE AIR. WE
23 WANTED TO MAKE SURE WHAT WAS GOING ON DOWN THERE, SO WE DID
24 THAT INVESTIGATION AS WELL. THE GROUNDWATER, WE DID
25 ANOTHER INVESTIGATION. WE DID SOME MORE SAMPLING IN 1992

1 AT THE REQUEST OF THE STATE BECAUSE THEY FELT LIKE WE
2 NEEDED TO DO SOME MORE CHARACTERIZATION, AND BASICALLY
3 WE -- WE DIDN'T COME TO A CONCLUSION AS TO WHETHER THE SITE
4 WAS CONTRIBUTING TO GROUNDWATER CONTAMINATION OR NOT
5 CONTRIBUTING, SO WE'RE GOING TO BE LOOKING AT GROUNDWATER
6 SEPARATELY, BUT I WANT TO STRESS RIGHT NOW THAT OUR
7 INVESTIGATION SHOWED THAT THE SITE IS NOT CONTRIBUTING TO
8 ANY DRINKING WATER CONTAMINATION BECAUSE THERE ARE SEVERAL
9 LAYERS OF GROUNDWATER BEFORE ANY DRINKING WATER SOURCE THAT
10 THE CITY OF SANTA FE SPRINGS USES, SO THERE'S NO DRINKING
11 WATER THREAT, AND WE WANT TO MAKE SURE THAT THAT DOESN'T
12 HAPPEN AT SOME TIME IN THE FUTURE.

13 I'LL TALK A LITTLE BIT ABOUT SOME OF THE SITE
14 CONDITIONS TO DATE. I WANT TO PUT THIS PICTURE UP. THIS
15 SHOWS SOME OF THE DOCUMENTED DISPOSAL AREAS THAT WE FOUND
16 DURING THE INVESTIGATION, AND THESE ARE MOSTLY FROM AERIAL
17 PHOTOGRAPHS. WE'RE LUCKY THAT WE HAVE PHOTOGRAPHIC RECORDS
18 BACK TO, I THINK, 1928 OR 1937 ANYWAY THAT SHOW DIFFERENT
19 DISPOSAL SITES THAT WERE OCCURRING DURING THIS TIME. SO
20 THIS IS -- SO WE KIND OF LOOKED AT THIS AND THOUGHT WELL,
21 YOU KNOW, IT LOOKS LIKE THEY USED THIS ENTIRE SITE FOR
22 DISPOSAL, SO WE PUT A GRID DOWN AND BASICALLY DUG 100 HOLES
23 DOWN TO THE GROUNDWATER AND SAMPLED THE SOIL EVERY FIVE
24 FEET TO DETERMINE WHAT KIND OF CONTAMINATION WAS THERE. WE
25 ALSO PUT IN 26 VAPOR WELLS TO SAMPLE THE GASES THAT ARE

1 DOWN IN THE GROUND AND 27 GROUNDWATER WELLS TO SAMPLE THE
2 GROUNDWATER.

3 THE SOIL INVESTIGATION IS WHAT REALLY DROVE
4 ANY -- WHAT DROVE THIS INVESTIGATION FURTHER BECAUSE MOST
5 OF THE -- MOST CONTAMINATED MEDIA IS SOIL, AND MOST OF THE
6 SOIL CONTAMINATION WE FOUND IS BELOW THE SURFACE BECAUSE
7 THEY DID GRADE THIS OVER, AND THE CONTAMINATION OCCURRED
8 OVER A LONG PERIOD OF TIME, SO MOST OF THE CONTAMINATION IS
9 BELOW FIVE FEET. I ALSO WANT TO STRESS THAT MOST OF THE
10 CONTAMINATION IS AT FAIRLY LOW LEVELS, AND, IN FACT, MOST
11 IS WITHIN A LEVEL THAT E.P.A. COULD WALK AWAY FROM AND SAY
12 IT'S WITHIN OUR ACCEPTABLE RISK RANGE. HOWEVER, THAT'S AT
13 CURRENT EXPOSURE, AND RIGHT NOW THERE'S NO REAL THREAT TO
14 HUMAN HEALTH, BUT IF THIS SITE IS SOMEHOW DEVELOPED AND
15 PEOPLE START DIGGING AND GET DOWN INTO WHERE THE
16 CONTAMINATION IS, YOU KNOW, AT 10 FEET UP TO 35 OR 40 FEET
17 DOWN, THEN THERE'S A POTENTIAL RISK, AND SO THAT'S WHAT WE
18 WANT TO ADDRESS IS ANY POTENTIAL RISK THAT COULD LEAD TO --
19 OR ANY POTENTIAL ACTIVITIES THAT COULD LEAD TO AN EXPOSURE
20 DOWN THE ROAD, SO THAT'S BASICALLY WHERE THE THRUST OF OUR
21 ACTIVITIES AND THAT'S WHERE THIS PREFERRED PLAN OR PROPOSED
22 PLAN IS TRYING TO ADDRESS THAT RISK.

23 I WANT TO STRESS A LITTLE BIT, LIKE I SAID, ABOUT
24 THE SUBSURFACE GAS AS IT SLOWLY COMES UP TO THE SURFACE,
25 AND WE DIDN'T DETECT ANY OF THESE GASES AT THE SURFACE WHEN

1 WE WERE DOING OUR INVESTIGATION, BUT WE KNOW THAT IT'S DOWN
2 THERE AT 65 FEET, AND WE KNOW THAT METHANE HAS A TENDENCY
3 TO RISE. WE DID DETECT IT AT THE SURFACE, BUT WE'RE GOING
4 TO BE DOING SOME MORE INVESTIGATIONS TO MAKE SURE THAT IT
5 ISN'T COMING TO THE SURFACE BECAUSE IF IT IS, WE WOULD LIKE
6 TO MITIGATE THAT BY PUMPING IT OUT THROUGH THE VAPOR WELLS
7 WE ALREADY HAVE IN PLACE AND THEN FLARING IT, MUCH LIKE A
8 LANDFILL FLARE OR A FLARE THAT YOU SEE IN THE OIL WELLS
9 WHERE THEY BURN THE METHANE AS THAT'S COMING OUT, SO THAT'S
10 A COMPONENT OF OUR REMEDY, IF NECESSARY.

11 AND WE FOUND GROUNDWATER CONTAMINATION, BUT LIKE
12 I SAID, WE'RE GOING TO BE ADDRESSING THAT SEPARATELY
13 BECAUSE WE NEED TO FIND SOME MORE DATA, AND WE ARE LOOKING
14 FORWARD TO WORKING WITH THE CITY AS WELL AS THE STATE
15 REGIONAL WATER QUALITY CONTROL BOARDS AND THE STATE
16 DEPARTMENT OF TOXIC SUBSTANCES CONTROL TO GET A LARGER
17 PICTURE OF THE CONDITIONS OF GROUNDWATER, ESPECIALLY AT
18 SHALLOW LEVELS, WHICH IS NOT NORMALLY WHAT PEOPLE STUDY
19 BECAUSE PEOPLE LOOK AT THE DRINKING WATER SUPPLY, WHICH IS
20 MUCH DEEPER. WE WANT TO -- WE NEED TO LOOK AT THE SHALLOW
21 GROUNDWATER, WHICH IS WHAT THE SITE WOULD IMPACT, SO WE'RE
22 GOING TO BE DOING SOME MORE INVESTIGATIONS INTO THAT AREA
23 AND LOOKING AT A BROADER PICTURE, HOPEFULLY IN
24 OCTOBER/NOVEMBER TIME FRAME, EVERYONE GETTING TOGETHER.

25 AT THIS POINT, I'D LIKE TO TALK A LITTLE BIT

1 ABOUT OUR ALTERNATIVES THAT WE REVIEWED THAT ARE IN THE
2 FEASIBILITY STUDY. IN THE FEASIBILITY STUDY WE LOOK AT A
3 LOT OF DIFFERENT THINGS, DIFFERENT TECHNOLOGIES THAT WE
4 COULD USE AND DIFFERENT TREATMENT OPTIONS. ONE OF THE
5 PROBLEMS AT THIS SITE IS WE HAVE A VARIETY OF CONTAMINANTS
6 THAT NO ONE TECHNOLOGY IS USUALLY COMPATIBLE WITH MULTI --
7 MULTIPLE CONTAMINATION UNLESS THEY'RE ALL SIMILAR, SO WE
8 DID LOOK AT A LOT OF TECHNOLOGIES AND THEN SCREEN THEM OUT
9 BECAUSE THEY WEREN'T PRACTICAL, AND THE SEVEN THAT WERE
10 PRESENTED IN THE FEASIBILITY STUDY OR IN THE PROPOSED PLAN
11 ARE ALSO UP HERE (INDICATING), AND FIRST I'D LIKE TO GO
12 THROUGH E.P.A.'S PREFERRED ALTERNATIVE, BUT I WANT TO
13 STRESS THAT ALL OF THESE ALTERNATIVES ARE, YOU KNOW, UP FOR
14 COMMENT BASICALLY, AND NONE OF THEM ARE REALLY SET IN
15 STONE. I MEAN IF THERE'S A COMPONENT THAT YOU FEEL REALLY
16 STRONGLY ABOUT THAT WE SHOULD EMPLOY IN OUR PREFERRED
17 ALTERNATIVE, WE NEED TO KNOW THAT, AND THESE ARE ALL, YOU
18 KNOW -- WE CAN KIND OF CONTOUR THE REMEDY TO MAKE SURE THAT
19 IT'S PROTECTIVE, WHICH IS OUR FIRST GOAL, AND ALSO THAT IT
20 HAS COMMUNITY ACCEPTANCE, WHICH IS ONE OF THE CRITERIA THAT
21 WE NEED TO USE.

22 OUR FIRST GOAL THOUGH IS MAKE SURE WE PREVENT ANY
23 EXPOSURE AND PREVENT ANY FURTHER EXPOSURE, AND THEN THE
24 OTHER ALTERNATIVES -- THE CRITERIA THAT WE LOOK AT INCLUDE
25 COMMUNITY ACCEPTANCE, SO OUR PROPOSED AL -- OUR PREFERRED

1 ALTERNATIVE IS ALTERNATIVE 3C, WHICH IS LISTED IN THE FACT
2 SHEET AND ALSO IN THE FEASIBILITY STUDY. I'M GOING TO
3 THROW UP THAT SCHEMATIC RIGHT HERE. BASICALLY THERE'S FOUR
4 COMPONENTS TO IT. THE FIRST ONE IS LIMITED EXCAVATION, AND
5 WHAT WE WANT TO DO HERE IS IN THESE RED AREAS, THAT'S AREAS
6 WHERE IT'S BASICALLY AN UNDEVELOPED PROPERTY SO THAT THE
7 CONTAMINATION THAT'S IN THE SOIL UNDER THE GROUND -- UNDER
8 THE SURFACE IS EASIER TO GET TO, AND SO WHAT WE'D LIKE TO
9 DO IS EXCAVATE THAT SOIL AND CONSOLIDATE IT OVER HERE IN
10 THIS MIDDLE ABOVE WHERE THE RESERVOIR IS TO FREE UP THIS
11 PROPERTY (INDICATING) FOR UNRESTRICTED DEVELOPMENT.

12 THE SECOND COMPONENT IS AN INSTITUTIONAL CONTROL,
13 WHICH IS KIND OF A FANCY PHRASE FOR ANY NUMBER OF THINGS,
14 INCLUDING DEED RESTRICTION, NOTICES ON THE DEED THAT JUST
15 LET PEOPLE KNOW WHAT IS AT THE SITE ALL THE WAY TO SOME
16 KIND OF ZONING RESTRICTION OR A DESIGNATION BY THE STATE
17 THAT THIS IS A HAZARDOUS PROPERTY WITH LIMITED USE. WE'LL
18 BE WORKING WITH THE PROPERTY OWNERS AND THE CITY AS WELL AS
19 THE STATE TO DETERMINE WHAT EXACTLY NEEDS TO BE DONE ON
20 EACH PARCEL AROUND HERE WHERE WE FOUND CONTAMINATION
21 (INDICATING) AS WELL AS THIS CENTRAL AREA THAT WE'RE GOING
22 TO BE PAVING, WHICH IS THE THIRD COMPONENT OF THE
23 ALTERNATIVE, TO MAKE SURE THAT WE ARE BEING PROTECTIVE BUT
24 ALSO NOT BEING TOO RESTRICTIVE IN ALLOWING SOME USE. SINCE
25 WE'VE DONE A PRETTY THOROUGH INVESTIGATION ON EACH PARCEL,

1 WE CAN TELL WHAT IS UNDERNEATH EACH PARCEL, SO WE CAN LET
2 PEOPLE KNOW WHAT THE RISKS ARE. IF THE RISKS ARE AT 25
3 FEET, WE CAN PRETTY MUCH ALLOW, YOU KNOW, USE OF 20 FEET OF
4 THE PROPERTY, AND SO MOST OF THE PROPERTY IS ALREADY
5 DEVELOPED AROUND HERE. WE WILL NOT BE DOING ANY -- WE
6 WON'T BE IMPACTING THE CURRENT BUSINESSES THAT WE HAVE THAT
7 ARE ON THE SITE.

8 THE THIRD COMPONENT IS THIS GREEN HATCHED AREA,
9 WHICH IS WHAT WE CALL THE R.C.R.A. CAP. R.C.R.A. IS THE
10 RESOURCE, CONSERVATION AND RECOVERY ACT, WHICH IS A FEDERAL
11 LAW THAT REGULATES HAZARDOUS WASTE SITES, HAZARDOUS WASTE
12 GENERATORS AND HAZARDOUS MATERIALS, AND SO WHILE IT DOESN'T
13 DIRECTLY APPLY TO THE SITE BECAUSE THIS WASN'T REALLY A
14 MUNICIPAL LANDFILL AND IT WASN'T A HAZARDOUS WASTE
15 LANDFILL, THEY ADDRESS A LOT OF THE SAME CONCERNS THAT WE
16 HAVE HERE, WHICH IS CONTACT WITH THE EXPOSURE -- CONTACT
17 WITH THE CONTAMINATION, WHICH LEADS TO EXPOSURE AND
18 PREVENTION OF GROUNDWATER CONTAMINATION. WHAT CAN HAPPEN
19 IN SOME INSTANCES IS IF YOU HAVE SOIL THAT'S CONTAMINATED,
20 YOU HAVE RAINWATER HIT THE GROUND, AND IT FLUSHES THROUGH,
21 YOU KNOW, THAT'S HOW WATER GETS INTO THE GROUND, AND IT
22 FLUSHES THE CONTAMINATION THROUGH AND CAN LEAD TO
23 GROUNDWATER CONTAMINATION. SO WE WANT TO PREVENT THAT FROM
24 HAPPENING BY PUTTING A PHYSICAL BARRIER HERE, WHICH IS
25 ASPHALT, AND UNDERNEATH IT A THIN PLASTIC LAYER, WHICH IS,

1 YOU KNOW, PRETTY TOUGH TO POKE A HOLE THROUGH IT SO THAT WE
2 HAVE TWO LAYERS THAT WATER CAN'T GET THROUGH, AND WATER
3 WILL BE SHEDDED OFF TO THE SIDES HERE (INDICATING). THAT
4 WOULD PREVENT GROUNDWATER FROM BECOMING CONTAMINATED BY
5 SOME RAINWATER FLUSHING THROUGH, AND IT WILL ALSO PROVIDE A
6 PHYSICAL BARRIER TO PEOPLE SO THAT THEY WON'T -- IT MAKES
7 IT MORE DIFFICULT TO DIG A HOLE THROUGH, YOU KNOW, SIX
8 INCHES OF ASPHALT THAN IF WE WERE JUST TO LEAVE IT AS PLAIN
9 SOIL.

10 THEN THE FOURTH COMPONENT, AS I SAID BEFORE, IS A
11 GAS TREATMENT AND FLARING SYSTEM IF THAT BECOMES
12 NECESSARY. WE'VE GOT SEVERAL VAPOR WELLS THROUGHOUT THE
13 SITE, SO IF WE DO NEED TO EMPLOY SOME KIND OF GAS
14 COLLECTION AND TREATMENT SYSTEM, WE'VE GOT A LOT OF THE
15 APPARATUS ALREADY THERE, BUT WE'LL BE DOING MORE
16 INVESTIGATIONS INTO THAT AREA DURING DESIGN TO MAKE SURE
17 THAT'S NECESSARY, AND THEN WE'LL BE MONITORING EVERY YEAR
18 TO MAKE SURE THAT OUR REMEDY IS BEING PROTECTIVE AND THAT
19 GROUNDWATER IS NOT BECOMING MORE CONTAMINATED AND THAT GAS
20 IS NOT MIGRATING FROM UNDERNEATH THIS CAP AND COMING OUT,
21 YOU KNOW, THE SIDES, SO WE'LL BE MONITORING EVERY YEAR AND
22 THEN EVALUATING OUR REMEDY AT LEAST EVERY FIVE YEARS, WHICH
23 IS BY STATUTE WE HAVE TO LOOK AT EVERY FIVE YEARS OUR
24 REMEDY TO MAKE SURE IT'S PROTECTIVE BECAUSE WE ARE LEAVING
25 WASTES IN PLACE HERE.

1 OKAY. LET ME GO BACK THROUGH -- OH, I'LL JUST
2 SHOW YOU THIS REAL QUICK. THIS IS THE R.C.R.A. CAP, WHICH
3 IS KIND OF A SCHEMATIC OF WHAT WE HOPE THAT OUR CAP WOULD
4 LOOK LIKE. BASICALLY WE'VE GOT THE WASTE MATERIAL DOWN
5 HERE (INDICATING), AND WE'VE GOT FIVE FEET OF ALREADY SOIL
6 COVERING. WHAT WE WOULD DO IS THIS WOULD BE THE
7 CONSOLIDATED MATERIAL WE'D EXCAVATE FROM THE OTHER AREAS OF
8 THE SITE, AND THEN WE'D HAVE THE FLEXIBLE MEMBRANE LAYER
9 OVER THE WHOLE THING AND THEN SIX INCHES OF ASPHALT OVER
10 THE TOP OF THAT.

11 OKAY. I WANT TO TALK A LITTLE BIT ABOUT THE
12 OTHER ALTERNATIVES WE LOOKED AT, AND THEY'RE ALSO EXPLAINED
13 IN THE FACT SHEET. THE FIRST ONE, THE NO ACTION
14 ALTERNATIVE, WE ARE REQUIRED BY LAW TO LOOK AT AS KIND OF A
15 BASELINE FOR IF WE JUST WALKED AWAY FROM THE SITE, WHAT
16 WOULD THE RISKS BE, WHAT WOULD THE COSTS BE, AND THEN WE
17 USE THAT AS A COMPARISON.

18 WE WOULD -- INCLUDED IN THAT NO ACTION
19 ALTERNATIVE IS SAMPLING. WE WOULD HAVE TO CONTINUE TO
20 SAMPLE THE GROUNDWATER IN THE SOIL AND THE VAPOR BECAUSE OF
21 THE WASTES LEFT IN PLACE. ALTERNATIVE TWO IS FENCING,
22 REVEGETATION AND INSTITUTIONAL CONTROLS. THAT'S PRETTY
23 SELF-EXPLANATORY. WE'D AUGMENT THE FENCES WE HAVE
24 CURRENTLY AROUND THE SITE TO MAKE IT TALLER AND LESS
25 ACCESSIBLE WITH BARBED WIRE OR RAZOR WIRE, REVEGETATE THE

1 AREAS THAT WE DUG AND PUT THE WELLS IN TO MAKE SURE WE HAVE
2 NOT ANY BARE SPOTS THAT WE CREATED AND THEN JUST PUT THOSE
3 INSTITUTIONAL CONTROLS IN. THEY WOULD BE DIFFERENT FROM
4 THE ALTERNATIVES DOWN HERE BECAUSE WE WOULDN'T HAVE ALLOWED
5 ANY USE OF THAT CENTRAL PROPERTY BECAUSE WE HADN'T DONE
6 ANYTHING TO IT, SO WE'D WANT TO MAKE SURE THAT IT
7 DOESN'T -- IT WON'T BE DISTURBED. WE'D HAVE SIMILAR
8 CONTROLS THAT WE WOULD HAVE FOR THE OTHER ALTERNATIVES
9 AROUND THOSE BUSINESS PROPERTIES, YOU KNOW, THESE -- THESE
10 PROPERTIES HERE (INDICATING). WE'D BASICALLY BE FENCING
11 THIS WHOLE AREA AROUND HERE AND THEN PREVENTING ANY FUTURE
12 USE.

13 ALTERNATIVE THREE IS BASICALLY THE CONTAINMENT
14 OPTIONS, AND WE DIVIDED THEM INTO FOUR DIFFERENT
15 CONTAINMENT OPTIONS AND DEGREES OF COMPLEXITY. THE FIRST
16 ALTERNATIVE IS A MULTI-LAYER SOIL CAP. IT BASICALLY WOULD
17 BE AN AUGMENTATION OF WHAT WE ALREADY HAVE. WE'VE GOT FIVE
18 FEET OF SOIL COVERING THE CONTAMINATION. WE WOULD PUT AN
19 ADDITIONAL CLAY LAYER DOWN TO MAKE IT LESS PERMEABLE TO
20 WATER, AND THEN WE'D PUT DOWN TWO FEET OF TOP SOIL SO THAT
21 THEN PLANTS AND SHRUBS COULD GROW THERE, AND THEY WOULD
22 HAVE TO BE MAINTAINED LIKE A -- LIKE A REGULAR LAWN, AND
23 THAT WOULD BE OVER THE ENTIRE AREA THAT'S EXPOSED RIGHT
24 NOW, WHICH WOULD BE THIS WHOLE AREA (INDICATING) AND NOT --
25 NOT JUST THIS SQUARE BUT ALSO THESE PARCELS HERE

1 (INDICATING).

2 ALTERNATIVE 3B COVERS THAT SAME AREA, ANY AREA OF
3 THE SITE THAT IS UNDEVELOPED, AND IT HAS POTENTIAL FOR
4 EXPOSURE BECAUSE IT'S LESS -- YOU KNOW, THERE'S LESS
5 PHYSICAL BARRIER THERE. MOST OF THE SITE IS COVERED WITH
6 CONCRETE OR PAVEMENT OR BUILDINGS, SO WE DON'T NEED TO ADD
7 ANYTHING TO THAT BECAUSE THAT'S A PRETTY EFFECTIVE BARRIER,
8 BUT IN THE AREAS THAT ARE UNDEVELOPED, WE'D PUT JUST A
9 SIMPLE ASPHALT CAP, BASICALLY KIND OF LIKE A PARKING LOT.

10 THE THIRD ALTERNATIVE, WHICH I EXPLAINED IS
11 E.P.A.'S PREFERRED ALTERNATIVE, IS THE ASPHALT CAP WITH AN
12 ADDITIONAL PLASTIC LAYER UNDERNEATH IT AS AN ADDED
13 PROTECTION LAYER FOR GROUNDWATER INFILTRATION AND A
14 BARRIER FOR, YOU KNOW, CONTACT AND EXPOSURE.

15 THE FOURTH ONE IS BASICALLY MORE LAYERS THAN 3C.
16 A FULL R.C.R.A. CAP AND THE GUIDELINES FOR CLOSING A
17 MUNICIPAL LANDFILL, THERE ARE JUST SOME ADDITIONAL LAYERS
18 OF STONES, COBBLES, THAT KIND OF THING THAT ARE ALSO
19 REQUIRED. IT MAKES THE CAP ABOUT FIVE FEET THICK, AND
20 WITHOUT ANY REAL ADDITIONAL BARRIERS TO RAINWATER
21 INFILTRATION, WE FEEL THAT WE NEED THE REQUIREMENTS WHICH
22 ARE TO BE PROTECTIVE OF GROUNDWATER AND PROTECTIVE OF HUMAN
23 HEALTH BY EXPOSURE BY THE MORE SIMPLE ASPHALT THAN THE
24 PLASTIC LINER.

25 MR. SHARP: QUESTION? ON THE PREVIOUS SLIDE YOU

1 SHOWED THE AREA FENCED. IF I'M UNDERSTANDING THE
2 PRESENTATION, THE RED AREAS WILL BE EXCAVATED. THAT
3 MATERIAL WILL BE MOVED INTO THE GREEN AREA, THEN THE ENTIRE
4 AREA WILL CONTINUE TO BE FENCED, AND THE ENTIRE AREA WILL
5 BE COATED WITH AN ASPHALT LAYER?

6 MR. HARRIS-BISHOP: YES. WITH OUR --

7 MR. SHARP: ALL THE ENTIRE SURFACE AREA WITHIN THE
8 FENCE?

9 MR. HARRIS-BISHOP: YEAH, THE AREA WITHIN HERE
10 (INDICATING). WE DON'T ACTUALLY -- WE WOULD NOT REQUIRE A
11 FENCE ALONG THIS BORDER. WE'VE GOT A FENCE ALREADY ALONG
12 HERE (INDICATING).

13 MR. SHARP: SO THE FENCE WOULD REMAIN ON THE OUTSIDE
14 PERIMETER OF THE ENTIRE PROPERTY. INSIDE THE FENCE IT
15 WOULD BE ASPHALTED.

16 MR. HARRIS-BISHOP: YEAH. ACTUALLY THOUGH -- I MEAN
17 THE ISSUE OF A FENCE IS SOMETHING THAT CAN BE DEALT WITH
18 LATER. THAT WOULD PROBABLY BE MORE OF A PROPERTY OWNER'S
19 DECISION BECAUSE WITH THIS CAP, WE WOULD BE PROTECTIVE, SO
20 WE WOULDN'T NECESSARILY NEED THE FENCE TO BE THERE TO ADD
21 THAT EXTRA LAYER OF PROTECTION BECAUSE WE'VE ALREADY
22 EXCAVATED THE CONTAMINATED SOIL FROM HERE. PROBABLY A
23 FENCE WOULD BE A GOOD IDEA JUST TO KEEP PEOPLE FROM BEING
24 ON THE PROPERTY, YOU KNOW, SKATEBOARDERS OR WHATEVER, SINCE
25 IT MAY BE AN ATTRACTIVE SKATEBOARDING AREA IF IT'S A NICE,

1 SMOOTH ASPHALT SURFACE.

2 MR. SHARP: QUESTION. IF THE GREEN AREA IS THE AREA
3 THAT YOU'RE CONCERNED WITH, WHY WOULD NOT THE FENCE BE
4 MOVED BACK TO THE GREEN AREA SO ALL THE WHITE AREA, WHICH
5 HAD BEEN EXCAVATED AND THE IMPURITIES REMOVED FROM THE
6 SOIL, BE ABLE TO BE OPEN FOR DEVELOPMENT?

7 MR. OPALSKI: PULL UP THE OTHER SLIDE BECAUSE WHAT YOU
8 NEED TO CLARIFY IS SOME OF THE ALTERNATIVES CALL FOR THAT
9 EXCAVATION AND OTHERS DO NOT.

10 MR. HARRIS-BISHOP: THIS ONE (INDICATING)?

11 MR. SHARP: I THINK WE'RE ONLY DEALING WITH 3C, AND
12 THAT'S YOUR PREFERRED, SO I THINK --

13 MR. HARRIS-BISHOP: I WANTED TO EXPLAIN ALL THE
14 ALTERNATIVES THOUGH SO THAT EVERYONE KNOWS THAT ALL THOSE
15 ALTERNATIVES ARE STILL, YOU KNOW, DEBATABLE. WE CAN
16 DISCUSS THOSE, AND THEY'RE ALL UP FOR DISCUSSION.

17 THE REPORTER: WOULD YOU IDENTIFY YOURSELF, PLEASE?

18 MR. SHARP: BEG YOUR PARDON?

19 THE REPORTER: WOULD YOU IDENTIFY YOURSELF?

20 MR. SHARP: MY NAME'S ALBERT SHARP, S-H-A-R-P.

21 MR. HARRIS-BISHOP: SO YEAH, WE'D BE EXCAVATING THESE
22 RED AREAS SO THAT THEY COULD UNDERGO SOME FUTURE
23 DEVELOPMENT. IF THE OWNER OF THE PROPERTY WANTS THAT TO BE
24 FENCED, I MEAN THAT WOULD BE THEIR DECISION, BUT THE
25 FENCING THAT WE HAVE CURRENTLY IS TO PREVENT PEOPLE FROM

1 COMING ONTO THE SITE. WITH OUR CAP, WE WOULD BE
2 PROTECTIVE, SO WE WOULDN'T NEED THAT EXTRA LAYER OF
3 PROTECTION, WHICH IS BASICALLY A FENCE.

4 MARILYN, DO YOU HAVE A --

5 MS. UNDERWOOD: SO JUST TO CLARIFY, YOU'RE NOT
6 PROPOSING TO PAVE THE AREA THAT WAS EXCAVATED.

7 MR. HARRIS-BISHOP: NO. BECAUSE THEN THAT WILL BE
8 OPEN TO FUTURE DEVELOPMENT BECAUSE WE WOULD BE REMOVING THE .
9 RISK THAT WAS PROPOSED WITH DEVELOPMENT BECAUSE WITH
10 DEVELOPMENT THERE WOULD BE A FOUNDATION, WHATEVER. YOU'D
11 HAVE TO GET DOWN AND POTENTIALLY BE EXPOSED. WE'D BE
12 REMOVING THAT RISK.

13 MR. SHARP: WOULD YOU CLARIFY THAT THEN ONCE AGAIN
14 BECAUSE I ASKED A QUESTION, AND YOU SAID IT WOULD BE
15 PAVED. SHE ASKED THE SAME QUESTION; YOU SAID IT WOULDN'T
16 BE. INSIDE THE EXISTING FENCED AREA, ONLY THE GREEN AREA
17 NOW OUTLINED WILL BE PAVED.

18 MR. HARRIS-BISHOP: YES.

19 MR. SHARP: ALL THE REST WILL BE DEVELOPABLE WITH
20 DIRT, WITH ALL THE FOUNDATIONS AND THOSE CONSEQUENCES AND
21 EVERYTHING REMOVED.

22 MR. OPALSKI: RUSTY, LET ME CLARIFY. AGAIN, I WANT TO
23 CLARIFY THERE HASN'T BEEN A DECISION MADE, SO WE HAVE TO BE
24 REAL PRECISE HOW WE'RE ASKING THAT QUESTION. UNDER 3C,
25 E.P.A.'S PREFERRED ALTERNATIVE, WHAT YOU STATE IS TRUE.

1 ONLY THE AREA THAT'S IN THE GREEN HATCH WOULD BE PAVED,
2 OKAY? UNDER SOME OF THE OTHER ALTERNATIVES, INCLUDING THE
3 ALTERNATIVE RUSTY DISCUSSED, IT WAS JUST THE FENCING WITH
4 INSTITUTIONAL CONTROLS. THERE WOULDN'T BE ANY EXCAVATION
5 IN THOSE AREAS, AND, THEREFORE, FOR PROTECTIVENESS THE
6 FENCING WOULD BE EXPANDED TO INCLUDE THE AREAS THAT ARE IN
7 RED BECAUSE UNDER THAT ALTERNATIVE, THERE WOULDN'T BE THE
8 EXCAVATION.

9 MR. HARRIS-BISHOP: SO NONE OF THAT LAND WOULD BE
10 FREED UP FOR DEVELOPMENT BECAUSE CONTAMINATION STILL EXISTS
11 AND THE RISK FOR EXPOSURE WOULD STILL EXIST.

12 MR. OPALSKI: IS THAT CLEAR THOUGH? I WANT TO MAKE
13 SURE.

14 MR. SHARP: NO, IT HASN'T CHANGED ANY SINCE 1984.

15 MR. OPALSKI: NO, I WANT TO MAKE SURE WE'RE CLEAR
16 BEFORE WE MOVE ON BECAUSE IT'S AN IMPORTANT QUESTION. THE
17 DIFFERENCE IS THAT WE'RE ANSWERING -- I GUESS THE POINT IS
18 THE ANSWER TO THE QUESTION IS DIFFERENT DEPENDING ON WHICH
19 ONE OF THESE ALTERNATIVES YOU'RE ASKING ABOUT. UNDER
20 E.P.A.'S PREFERRED ALTERNATIVE, THE EXCAVATION IN THE RED
21 AREA OCCURS, THE EXCAVATED MATERIAL GETS MOVED TO THE AREA
22 WHERE THE CONCRETE SUMP IS, AND A CAP IS PUT OVER THAT
23 AREA. THE CAP DOES NOT EXTEND TO AREAS WHERE THE
24 EXCAVATION'S OCCURRED, SO THAT'S UNDER THE E.P.A.'S
25 PREFERRED ALTERNATIVE, THE ONE THAT'S PRESENTED AS

1 ALTERNATIVE 3C.

2 MR. SHARP: UNDER YOUR PREFERRED, ALL THE WHITE LAND
3 AND THE LAND NOW IN RED WOULD BE FREE FOR COMMERCIAL
4 DEVELOPMENT?

5 MR. OPALSKI: THAT'S CORRECT.

6 MR. SHARP: WITH THE TILT-UP BUILDINGS OR WHATEVER THE
7 PROPERTY OWNER WISHED TO PUT IN THAT AREA.

8 MR. HARRIS-BISHOP: WITH THE INSTITUTIONAL CONTROLS
9 THAT WOULD BE REQUIRED FOR THE PROPERTIES THAT STILL HAVE
10 CONTAMINATION UNDERNEATH THEM. WE'RE ONLY EXCAVATING THE
11 UNDEVELOPED AREAS BECAUSE WE CAN GET TO THEM WITHOUT
12 IMPACTING THE BUSINESSES. THERE'S STILL SOME UNDERLYING
13 CONTAMINATION IN THESE PARCELS THAT ALREADY HAVE BUILDINGS
14 AND PARKING LOTS THAT WE WOULD HAVE TO DO SOME KIND OF
15 RESTRICTION, EITHER A DEED NOTICE JUST SAYING THAT THERE IS
16 CONTAMINATION UNDER THESE PROPERTIES AND WHAT THAT
17 CONTAMINATION IS OR A ZONING RESTRICTION SAYING WHAT CAN
18 AND CAN'T BE DONE TO THE PROPERTY AND PERHAPS GO AS FAR AS,
19 IF WE CAN'T WORK THAT OUT, HAVING THE STATE DESIGNATE IT AS
20 A HAZARDOUS WASTE PROPERTY, WHICH HAS ITS OWN SUBSEQUENT
21 RESTRICTIONS ON USE. WE CAN'T REALLY -- E.P.A. CAN SAY
22 WE'D RATHER NOT HAVE ANYONE DIG UNDER ANY OF THESE
23 PROPERTIES WHERE WE HAVEN'T REMOVED THE MATERIAL, BUT WE
24 CAN'T PREVENT ANYONE FROM GOING OUT THERE AND DIGGING ON
25 THEIR OWN PROPERTY. WHAT WE'D LIKE TO DO THOUGH IS

1 MITIGATE ANY CHANCE OF EXPOSURE BY LETTING PEOPLE KNOW AND
2 LETTING SUBSEQUENT OWNERS KNOW THAT THERE IS CONTAMINATION
3 THERE AND WHAT THE RISKS ARE THAT ARE POSED BY DOING THESE
4 ACTIVITIES. THE CURRENT ACTIVITIES AT THE SITE DON'T POSE
5 ANY RISK FROM -- YOU KNOW, THEY DON'T POSE ANY EXPOSURE TO
6 THE CONTAMINATION. WHAT WE WANT TO PREVENT IS ANY FUTURE
7 EXPOSURE BY DIGGING OR SOMETHING AND LETTING PEOPLE KNOW
8 WHAT IS UNDER THERE, AND THAT'S WHAT THOSE INSTITUTIONAL
9 CONTROLS WOULD BE FOR ON THE SURROUNDING PROPERTIES. WE
10 HAVE INSTITUTIONAL CONTROLS ON THIS PAVED AREA ALSO BECAUSE
11 WE WANT TO MAKE SURE THAT WHATEVER IS DONE ON THAT
12 PROPERTY, THE FIRST GOAL, WHICH IS TO BE PROTECTIVE, IS
13 MAINTAINED BY KEEPING THAT CAP, YOU KNOW, THE INTEGRITY OF
14 THAT CAP MAINTAINED BY NOT PUTTING SOMETHING ON THERE
15 THAT'S GOING TO CRUSH IT OR CRACK IT OR, YOU KNOW, SPLIT IT
16 OPEN, SO THERE -- THERE CAN BE SOME LIMITED USES FOR THE
17 PROPERTY, BUT WE WANT TO MAKE SURE THAT WE ARE BEING
18 PROTECTIVE.

19 MS. HERRERA: RUSTY, WE HAVE A QUESTION.

20 MR. HARRIS-BISHOP: FATHER GALLAGHER?

21 FATHER GALLAGHER: MY NAME IS GALLAGHER, AND WHAT I'M
22 INTERESTED IS IN KNOWING: IS THAT THE ONLY PURPOSE OF THAT
23 CAP IS TO PREVENT RAINWATER FROM PASSING THROUGH THE TOP
24 LEVEL OF SOIL AND THEN TAKING WHATEVER ELEMENTS ARE BELOW
25 THERE TO A DEEPER LEVEL WHERE THE GROUNDWATER WOULD BE

1 AFFECTED; IS THAT CORRECT?

2 MR. HARRIS-BISHOP: THAT'S ONE OF THE PURPOSES. THE
3 OTHER PURPOSE IS TO MAKE -- PROVIDE ANOTHER PHYSICAL
4 BARRIER TO THE CONTAMINATION AND ALSO TO ALLOW SOME LIMITED
5 USE OF THE PROPERTY.

6 FATHER GALLAGHER: IF THERE IS ALREADY FIVE FEET OF
7 UNCONTAMINATED SOIL THERE, IS E.P.A. NOT CONVINCED THAT THE
8 CITY OF SANTA FE SPRINGS KEEPS GOOD ENOUGH RECORDS OF WHAT
9 IS GOING ON ON THEIR PROPERTIES THAT THEY WOULD NEVER USE
10 THAT PROPERTY, FOR EXAMPLE, TO BUILD A 50-STORY BUILDING OR
11 SOMETHING LIKE THAT?

12 MR. HARRIS-BISHOP: NO. I MEAN THAT'S -- IF WE
13 WERE -- IF WE WEREN'T GOING TO PUT THIS PAVEMENT HERE, THEN
14 WE WOULD HAVE THAT RESTRICTION IN PLACE, THAT, YOU KNOW,
15 WHAT COULD AND COULDN'T BE DONE ON THE PROPERTY BECAUSE WE
16 DON'T WANT TO HAVE ANY POTENTIAL -- AFTER WE'RE ALL GONE,
17 WITHIN 100 YEARS FROM NOW, WE'D HOPE THAT THOSE
18 RESTRICTIONS WOULD STILL BE IN PLACE.

19 FATHER GALLAGHER: SO AGAIN, MY QUESTION OR MY COMMENT
20 WOULD BE THAT -- THAT ANY KIND OF ACTIVITY THAT'S GOING ON
21 ON THAT PROPERTY RIGHT NOW IS REALLY -- THERE'S ABSOLUTELY
22 NO PROBLEM ABOUT THE SAFETY OF THAT PROPERTY.

23 MR. HARRIS-BISHOP: NO.

24 FATHER GALLAGHER: IN OTHER WORDS, JUST THE FENCE IS
25 PROTECTIVE.

1 MR. HARRIS-BISHOP: YEAH. AND WE JUST WANT TO MAKE
2 SURE THAT THAT CONTINUES TO BE, AND A FENCE IS A LIMITED
3 PROTECTION MEASUREMENT. I MEAN, AS YOU KNOW, THAT FENCE
4 HAS BEEN CLIMBED OVER AND STEPPED ON, AND I THINK EVEN A
5 SECTION HAS BEEN, I THINK, REMOVED, SO A FENCE IS ONLY --
6 IS A SHORT-TERM ALTERNATIVE. WITH AN ASPHALT CAP, WE FEEL
7 THAT HE HAVE A LONG-TERM PROTECTIVE MEASURE. LIKE WE
8 LOOKED AT THESE OTHER ALTERNATIVES. YOU KNOW, THERE ARE
9 PROS AND CONS WITH ALL OF THESE ALTERNATIVES. THIS ONE WE
10 FEEL MEETS ALL OF OUR REQUIREMENTS AND OUR GOALS, WHICH IS
11 TO BE PROTECTIVE AND PREVENT LONG-TERM EXPOSURE.

12 THE CURRENT CONFIGURATION AS IT IS NOW IS
13 MODERATELY PROTECTIVE, BUT IN THE LONG-TERM, WE CAN'T
14 ENSURE THAT, YOU KNOW, SOMEONE ISN'T GOING TO GO OUT THERE
15 AND -- AND BECOME EXPOSED INADVERTENTLY TO THAT DEPENDING
16 ON THE DEVELOPMENT SO --

17 FATHER GALLAGHER: BUT IN ORDER TO BE EXPOSED TO THAT,
18 THEY WOULD HAVE TO DIG 25 FEET BELOW GROUND?

19 MR. HARRIS-BISHOP: WELL, THEY'D HAVE TO DIG AT LEAST
20 FIVE FEET TO COME IN CONTACT WITH ANY CONTAMINATION, AND
21 MOST OF THE CONTAMINATION IN THIS AREA IS, IN FACT, AT 10
22 TO 15 FEET.

23 FATHER GALLAGHER: BUT THAT WILL ALREADY BE RESTRICTED
24 BY CITY ORDINANCE.

25 MR. HARRIS-BISHOP: CITY ORDINANCE OR A RESTRICTION ON

1 THE DEED, NOTICE ON THE DEED.

2 YES, MA'AM.

3 MS. HERRERA: EXCUSE ME. WOULD YOU STATE YOUR NAME?

4 MS. CABRAL: YOU'RE SAYING YOU'RE GOING TO PUT A CAP

5 ON THAT GREEN AREA, AND I KNOW RIGHT THERE WITH THE

6 BASEBALL FIELD AND ST. PAUL, IT'S NOT FLAT.

7 MR. HARRIS-BISHOP: IT'S ACTUALLY -- IT KIND OF SLOPES

8 DOWN THROUGH HERE (INDICATING).

9 MS. CABRAL: IT'S ABOUT TEN FEET HIGH.

10 MR. HARRIS-BISHOP: WE CAN ACTUALLY MAKE --

11 MS. CABRAL: THAT'S GOING TO BE GOING DOWN TO THE

12 GROUND.

13 MR. CABRAL: MY NAME IS LOUIS CABRAL. ON THAT SITE

14 THERE, ARE THEY GOING TO JUST PUT IT ON TOP AND NOT ON THE

15 SIDE?

16 MR. HARRIS-BISHOP: NO. IT'S GOING TO GO ALL THE WAY

17 TO THE PROPERTY LINE, WHICH IS DOWN AT THE BOTTOM OF THAT

18 SLOPE, BECAUSE WE NEED TO MAKE SURE THAT WE HAVE A UNIFORM

19 DRAINAGE, SO WE WOULD HAVE A SLOPE, AN ASPHALT SLOPE, ALL

20 THE WAY DOWN HERE (INDICATING) AND THEN SOME KIND OF

21 DRAINAGE TO TAKE THAT WATER FROM THE RAINWATER THAT RUNS

22 OFF TO THE STORM DRAIN.

23 MR. CABRAL: ALL WHAT YOU'RE DOING IS TALKING ABOUT

24 COVERING EVERYTHING UP.

25 MR. HARRIS-BISHOP: YES, WITH SOIL.

1 MR. CABRAL: ACTUALLY, THE MAIN PLAN IS JUST COVERING
2 EVERYTHING UP.

3 MR. HARRIS-BISHOP: YES.

4 MR. CABRAL: AND LET SOMEBODY ELSE WORRY ABOUT IT DOWN
5 THE LINE WHO USES THE PROPERTY.

6 MR. HARRIS-BISHOP: TO PREVENT SOMEONE FROM COMING
7 INTO CONTACT WITH IT, YEAH, THAT'S THE BEST ALTERNATIVE
8 THAT WE CAN HAVE TO BE PROTECTIVE AND ALSO, YOU KNOW, HAVE
9 SOME KIND OF LIMITED USE.

10 THE FOURTH ALTERNATIVE --

11 MR. MORENO: RICK MORENO. IS IT TOO EXPENSIVE TO
12 CLEAN IT UP?

13 MR. HARRIS-BISHOP: YEAH.

14 MR. MORENO: IS THAT WHY YOU CAN'T CLEAN IT UP?

15 MR. HARRIS-BISHOP: THAT'S THE FOURTH ALTERNATIVE,
16 WHICH WAS -- ACTUALLY, WE LOOKED AT A COUPLE OF
17 ALTERNATIVES THAT WERE EXCAVATION AND OFF-SITE DISPOSAL OF
18 THAT SOIL. THIS AREA WE'RE TALKING ABOUT IS ALMOST
19 THREE-QUARTERS OF A MILLION CUBIC YARDS OF CONTAMINATED
20 SOIL THAT WOULD HAVE TO BE REMOVED, AND THE ESTIMATED COST
21 ON THAT IS ABOUT 120 MILLION DOLLARS, AND THIS HAS
22 CURRENTLY BEEN A TAXPAYER FUNDED PROJECT, SO IT -- AND THE
23 MAIN THING IS THAT THE RISKS THAT ARE POSED BY THE SITE
24 WITH THAT MATERIAL ARE FAIRLY LOW. IF THIS WERE SOMETHING
25 THAT WERE GOING TO BE AN IMMEDIATE HEALTH THREAT OR A HIGH

1 RISK MATERIAL THAT, YOU KNOW, CON -- WHERE PEOPLE COULD
2 COME CONTAMINATED WITH, WE WOULD DO THAT. WE WOULD REMOVE
3 THE SOIL, BUT THE CONTAMINATION IS FAIRLY LOW LEVELS, AND
4 IT DOESN'T POSE A RISK UNLESS -- WE LOOKED AT RESIDENTIAL
5 EXPOSURE, IF SOMEONE BUILT A HOUSE ON THIS PROPERTY AND
6 LIVED THERE FOR 70 YEARS, WHAT KIND OF CONTAMINATION --
7 WHAT KIND OF RISKS WOULD BE POSED BY THIS, AND WE LOOKED AT
8 IT, AND WE WERE ALMOST WITHIN OUR RISK RANGE NUMBERS
9 WITHOUT DOING ANYTHING. BY PROVIDING THIS CAP, WE'RE
10 REDUCING ANY POTENTIAL EXPOSURE AND BECOMING -- AND BEING
11 PROTECTIVE WITHOUT HAVING TO EXCAVATE.

12 THE OTHER -- LET ME JUST SAY ONE THING. IF WE'D
13 EXCAVATE IT, WE'D BE GENERATING A HUGE AMOUNT OF DUST. IF
14 WE'RE GOING TO DO THIS ENTIRE AREA, THAT WOULD TAKE A LONG
15 TIME AND WOULD EXPOSE THE SURROUNDING AREA, THE SCHOOL AND
16 THE NEIGHBORHOODS TO A HIGHER RISK. IT'S A MUCH ELEVATED
17 SHORT-TERM RISK THAT DOESN'T REALLY JUSTIFY THE RE -- THE
18 OVERALL REDUCTION IN THE RISK AND THEN THE COST, YOU KNOW,
19 IS AN ASTRONOMICAL COST.

20 THE QUESTION BEHIND THE FATHER FIRST.

21 MS. CALDERONE: MY NAME IS DEBORAH CALDERONE, AND I'M
22 CONCERNED ABOUT THE SEISMIC ACTIVITY THAT WE HAVE HERE IN
23 CALIFORNIA, AND NOTHING HAS BEEN SAID SO FAR ABOUT THE
24 REQUIREMENTS, IF THAT MEETS REQUIREMENTS TO DATE, AND WITH
25 THE CAPPING, WILL IT MEET FURTHER REQUIREMENTS?

1 MR. HARRIS-BISHOP: YEAH. THAT'S ONE -- IN THE -- I
2 HAVE A BRIEF EXPLANATION IN THE FACT SHEET. WE HAVE
3 REQUIREMENTS CALLED A.R.A.R.'S, WHICH ARE APPLICABLE OR
4 RELEVANT AND APPROPRIATE REQUIREMENTS THAT WE HAVE TO LOOK
5 AT. ONE OF THE THINGS THAT WE LOOK AT AS A -- AS SOMETHING
6 TO CONSIDER IS SEISMIC CRITERIA, AND SO WE WANT TO MAKE
7 SURE THAT THIS CAN WITHSTAND AN EARTHQUAKE, THAT IT'S NOT
8 GOING TO SHIFT AND CRACK. WITH THAT ADDED PLASTIC LINER,
9 WE HAVE AN ADDED LEVEL OF PROTECTION BECAUSE THE PLASTIC IS
10 MORE FLEXIBLE TO ALLOW FOR, YOU KNOW, SUBTLE MOVEMENTS, I
11 MEAN -- SO WE WILL TRY AND BE PROTECTIVE OF THOSE SEISMIC
12 CRITERIA.

13 YES, SIR.

14 FATHER GALLAGHER: I'D LIKE -- GALLAGHER -- AND I'D
15 LIKE A CLARIFICATION OF WHAT YOU WERE JUST SAYING THERE.
16 IF I WERE TO BUILD A HOUSE ON THAT PIECE OF PROPERTY AND
17 LIVE IN THAT HOUSE FOR 70 YEARS, YOU ARE NOT -- YOU ARE
18 SAYING THAT AS FAR AS THE E.P.A. WOULD BE CONCERNED, THAT
19 THERE'D BE NO GUARANTEE THAT I WOULD BE EXPOSED TO ANY
20 CONTAMINATED -- ANYTHING THAT WOULD HARM MY HEALTH AT ALL.

21 MR. HARRIS-BISHOP: THAT'S POSSIBLE. THE RISKS ARE
22 ELEVATED BECAUSE OF THE LEVELS OF CONTAMINATION THAT WE
23 HAVE HERE (INDICATING). LIKE I SAID, MOST OF THE SOIL
24 CONTAMINATION IS BELOW GROUND, SO IF YOU JUST -- YOU KNOW,
25 JUST EXISTED PURELY ON THE SURFACE, THE CONTAMINATION THAT

1 WE HAVE AT THE SURFACE IS LIMITED TO OVER HERE
2 (INDICATING), WHICH IS WHY WE FENCED THAT PROPERTY IN 1988,
3 AND SOME OF THE AREAS, I BELIEVE, THAT ARE ALREADY UNDER
4 PAVEMENT WE FOUND SOME SURFACE CONTAMINATION, SO YEAH, I
5 CAN'T SAY THAT, YOU KNOW, IF YOU BUILT A HOUSE THERE, YOU
6 WOULD HAVE NO RISK, BUT THE RISKS ARE FAIRLY LOW, AND THAT
7 SINCE MOST CONTAMINATION IS DOWN DEEP, YOU WOULDN'T RUN
8 INTO THAT RISK UNLESS YOU DUG, BUT YOU WILL BE DIGGING IF
9 YOU BUILD A HOUSE.

10 MR. MORENO: DOES METHANE COME UP LIKE AT THE LA BREA
11 TAR PITS? YOU HAVE -- ALL THE TIME YOU HEAR OF EXPLOSIONS
12 AND GAS, AND IT'S COMING UP ALL THE TIME EVEN THOUGH YOU
13 HAVE PAVEMENT THERE.

14 MR. HARRIS-BISHOP: YEAH. WE DO -- THAT'S WHY WE
15 WOULD BE LOOKING INTO THAT GAS TREATMENT AND COLLECTION
16 SYSTEM. WE'VE ALREADY GOT WELLS DUG THAT HAVE DETECTED
17 METHANE, BUT WE NEVER DETECTED ANYTHING AT THE SURFACE. WE
18 DETECTED IT DOWN DEEP WHERE WE HAVE THE ORGANIC MATERIAL
19 THAT'S DECOMPOSING CREATING METHANE, AND THERE'S METHANE
20 THROUGHOUT THIS --

21 MR. MORENO: IS THAT CRUDE OIL?

22 MR. HARRIS-BISHOP: PARDON?

23 MR. MORENO: IS THAT CRUDE OIL?

24 MR. HARRIS-BISHOP: NO. IT'S ORGANIC RELATED
25 MATERIAL, A LOT OF DECOMPOSED ORGANIC MATERIAL --

1 MR. MORENO: IS THERE ANY BENZENE --

2 MR. HARRIS-BISHOP: WE DID DETECT BENZENE IN ONE AREAS
3 OR TWO AREAS DOWN, AGAIN, AT DEPTH AND NOTHING AT THE
4 SURFACE. WHEN WE PUT OUR AIR MONITORS DOWN ON THE GROUND,
5 WE DIDN'T DETECT ANY BENZENE OR -- WE DIDN'T DETECT
6 ANYTHING OTHER THAN REGULAR AIR CONSTITUENTS, BUT WE WANT
7 TO MAKE SURE THAT WE'RE NOT GOING TO CAUSE A BIGGER PROBLEM
8 BY PUTTING A CAP ON THERE BECAUSE, AS YOU PROBABLY REALIZE,
9 IF WE ARE PREVENTING GROUNDWATER FROM GETTING CONTAMINATED
10 BY THE RAINWATER, WE'RE ALSO PREVENTING THE GASES FROM
11 SLOWLY COMING UP, BUT WHAT WE HAVE IS THESE HOLES ALREADY
12 DUG SO THAT WE CAN PULL THAT GAS OUT IF REQUIRED AND THEN
13 BURN IT.

14 MS. HERRERA: BEFORE WE GO TO THE NEXT QUESTION, SIR,
15 WOULD YOU PLEASE STATE YOUR NAME FOR THE RECORD?

16 MR. MORENO: RICK MORENO, M-O-R-E-N-O.

17 MR. HARRIS-BISHOP: OKAY.

18 FATHER GALLAGHER: DID YOU INTEND THIS ON BEING THE
19 QUESTION AND ANSWER SESSION --

20 MR. HARRIS-BISHOP: ACTUALLY, IF I CAN JUST GET
21 THROUGH -- I'M ALMOST FINISHED. I'M ALMOST AT THE END
22 SO . . .

23 THE ALTERNATIVE FOUR WHICH WE LOOKED AT IN THE
24 FEASIBILITY STUDY WAS LIMITED EXCAVATION AND JUST TAKING
25 THE RED AREAS ON THIS MAP AND TAKING THEM TO AN OFF-SITE

1 DISPOSAL AREA, AN ACCEPTABLE HAZARDOUS WASTE DISPOSAL AREA,
2 AND THEN, AGAIN, FENCING THIS CENTRAL PORTION TO PREVENT
3 ANYONE FROM COMING INTO CONTACT WITH IT, SO THAT'S
4 ALTERNATIVE FOUR.

5 LIKE I SAID EARLIER, WE ALSO LOOKED AT INITIALLY
6 EXCAVATING ANY CONTAMINATED MATERIAL FROM THE SITE. THE
7 VOLUME IS JUST HUGE. THE INCREASE IN SHORT-TERM RISKS IS
8 HIGH, AND THERE'S NOT A REAL BENEFIT TO DOING THAT BECAUSE
9 OF THE ADDED COST AND THE REDUCTION OF RISK IS SO SMALL
10 BECAUSE WE'VE ALREADY GOT THE CONTAMINANTS THAT WE FOUND IN
11 THE SOIL, LIKE ARSENIC, THALLIUM, BERYLLIUM AND OTHER
12 METALS ARE ALREADY CONSTITUENT HERE. THEY'RE NATURALLY
13 OCCURRING. THIS IS CALIFORNIA, AND WE HAVE AN ARSENIC --
14 YOU KNOW, IT'S JUST NATIVE TO HERE, SO WE HAVE, YOU KNOW, A
15 BACKGROUND LEVEL CONTAMINATION THAT EVEN IF WE ELIMINATED
16 THAT, IT WOULD JUST BE REALLY EXPENSIVE, AND WE WOULDN'T BE
17 REDUCING THE RISK THAT MUCH FOR THE AMOUNT OF MONEY THAT
18 WE'D BE SPENDING SINCE THE RISKS ARE FAIRLY LOW AT THE SITE
19 ALREADY.

20 YES, SIR.

21 MR. SHARP: ALBERT SHARP. QUESTION: BACK TO FATHER
22 GALLAGHER'S QUESTION. MY UNDERSTANDING IS THAT NO
23 PERMANENT DWELLING OR BUILDING COULD BE BUILT ON THE GREEN
24 AREA.

25 MR. HARRIS-BISHOP: YES.

1 MR. SHARP: YOU ASKED A QUESTION, IF I BUILT A HOUSE,
2 WOULD I BE ABLE TO LIVE THERE AND NOT SUFFER ILL WILL, AND
3 THE ANSWER WAS YES. MY UNDERSTANDING IS YOU CAN'T DO
4 ANYTHING IN THE GREEN AREA EXCEPT MAKE IT A PARKING LOT OR
5 A STORAGE AREA OR SOME OTHER -- MY PERSONAL FEELING --
6 UNDESIRABLE USE OF THE PROPERTY.

7 MR. HARRIS-BISHOP: YEAH. WHAT I WAS SAYING IS BASED
8 ON THE CURRENT RISKS AT THE SITE, IF YOU WERE TO BUILD A
9 HOUSE, NOT THAT YOU CAN --

10 MR. SHARP: YOU WOULDN'T BE ABLE TO GET A
11 PERMIT.

12 MR. HARRIS-BISHOP: IF YOU WERE, I MEAN THE RISKS ARE
13 LOW. I'M NOT SAYING THAT YOU ARE NOT GOING TO BECOME
14 EXPOSED, BUT WHAT I'M SAYING IS THAT THE RISKS ARE FAIRLY
15 LOW THAT YOU WOULD NOT SUFFER SOME ADVERSE CONSEQUENCE FROM
16 THE CONTAMINATION, BUT THAT IS POSSIBLE, SO WHAT WE WANT TO
17 DO IS PREVENT THAT CONTAMINATION FROM OCCURRING IN THE
18 FUTURE, SO BY PROVIDING THIS CAP AND PREVENTING ANY
19 CONSTRUCTION ON IT, WE WOULD PREVENT ANYONE FROM COMING
20 INTO CONTACT WITH THE CONTAMINATION, AND THAT'S OUR FIRST
21 GOAL IS TO PREVENT ANY CONTAMINATION OR EXPOSURE TO
22 CONTAMINATION, POTENTIAL OR CURRENT, AND SINCE WE DON'T
23 HAVE A CURRENT EXPOSURE, WE'RE LOOKING TO THE FUTURE TO BE
24 PROTECTIVE, SO I THINK -- YOU HAD A QUESTION, MR. CABRAL?

25 MR. CABRAL: LOUIS CABRAL. WHEN YOU SAID -- ON THE

1 ST. PAUL OVER THERE, IF YOU PUT A CAP ON IT AND I TAKE THIS
2 PIECE OF PAPER AND CAPPED IT AND STOPPED THE STUFF FROM
3 COMING UP, OKAY, HOW ABOUT THE STUFF GOING UNDERNEATH AND
4 GOING OUT FROM UNDERNEATH IT, WHAT ARE YOU GOING TO DO
5 ABOUT THAT?

6 MR. HARRIS-BISHOP: THAT'S WHAT I SAID. WE'RE GOING
7 TO BE LOOKING INTO HOW MUCH GAS IS ACTUALLY COMING UP, AND
8 IF WE DO SEE GAS COMING UP, WE WILL HAVE THESE WELLS IN
9 PLACE TO REMOVE IT. WE ALSO HAVE A PROPOSAL THAT'S
10 INCLUDED IN THE FEASIBILITY STUDY THAT WOULD INCLUDE
11 UNDERLAYING THE PLASTIC LINER WITH PERFORATED PVC TUBING
12 THAT WOULD BE RUN INTO THE PUMP SYSTEM TO PULL OUT ALL THE
13 GAS.

14 MR. CABRAL: I'M SAYING IT'S HARD HERE, AND IT'S HARD
15 HERE, BUT IT'S STILL GOING UNDERNEATH AND GOING THIS WAY
16 (INDICATING).

17 MR. HARRIS-BISHOP: THAT'S WHY WE WOULD BE PUMPING TO
18 REMOVE THAT GAS. I RECOGNIZE THAT THAT'S A CONCERN, AND
19 THAT'S A CONCERN OF MINE IS IF WE ASSUME THAT THE GAS IS
20 COMING UP FROM THE SOIL ALREADY, AND WE JUST HAVEN'T BEEN
21 ABLE TO DETECT IT, BUT IF WE PUT A CAP DOWN OR -- YOU KNOW,
22 WE WANT TO MAKE SURE THAT THAT DOESN'T HAPPEN. THAT'S WHY
23 WE'VE INCLUDED THE GAS --

24 MR. CABRAL: THE FENCE WILL NOT HOLD.

25 MR. HARRIS-BISHOP: PARDON?

1 MR. CABRAL: THE FENCE WILL NOT HOLD ON THAT DOTTED
2 LINE ON THE ST. PAUL SIDE.

3 MR. HARRIS-BISHOP: THE FENCE WILL NOT HOLD?

4 MR. CABRAL: RIGHT. THE GAS.

5 MR. HARRIS-BISHOP: NO, NO, NO, NO. IN FACT, THIS IS
6 A PARKING LOT THROUGH HERE (INDICATING). WE'RE GOING TO
7 HAVE PIPING AND PUMPS AND VAPOR WELLS TO --

8 MR. CABRAL: YOU CAN'T TELL ME GAS IS SMART ENOUGH TO
9 GO INTO THE PIPES.

10 MR. HARRIS-BISHOP: WELL, IT'S GOING TO RISE BECAUSE
11 METHANE RISES, AND SO THEN WE'RE GOING TO BE COLLECTING IT
12 THROUGH THOSE PIPES, AND THOSE PIPES WILL BE ATTACHED TO A
13 PUMP THAT PULLS THE AIR AND CREATES A VACUUM THAT WILL SUCK
14 IT INTO A TREATMENT -- A COLLECTION AND THEN BURNING
15 SYSTEM. SO -- YES, SIR.

16 FATHER GALLAGHER: YOU MEAN SIMILAR TO WHAT THEY'RE
17 DOING AT SHERATON INDUSTRY HILLS?

18 MR. HARRIS-BISHOP: YEAH, I BELIEVE --

19 FATHER GALLAGHER: THAT IS A HOTEL COMPLEX THAT IS
20 COMPLETELY OPERATED BY THE METHANE GAS THAT IS COMING FROM
21 THAT LANDFILL BELOW IT.

22 MR. HARRIS-BISHOP: YEAH. I BELIEVE THEY USE IT AS
23 POWERING THEIR GENERATOR OR SOMETHING.

24 FATHER GALLAGHER: I HAVE A COUPLE OTHER --

25 MR. HARRIS-BISHOP: UH-HUH.

1 FATHER GALLAGHER: ALL OF THIS -- I DON'T KNOW IF THIS
2 IS A QUESTION OR COMMENT OR SOMETHING, BUT IT DOES STRIKE
3 ME AS BEING A LITTLE BIT STRANGE THAT WE ALREADY HAVE A
4 CITY GOVERNMENT EMPOWERED TO MAKE DECISIONS FOR THE PEOPLE
5 WITHIN THE CITY BUT THAT THE E.P.A. WOULD COME IN AND
6 BECOME MORE RESTRICTIVE THAN YOU FEEL THAT THE CITY OF
7 SANTA FE SPRINGS WOULD BE WITH OUR ALREADY ELECTED
8 OFFICIALS, AND YOU WOULD PUT SOMETHING -- YOU WOULD FORCE
9 THE CITY TO COMPLY BEYOND JUST THE NORMAL LEVEL OF CONCERN
10 THAT THE PEOPLE WHO LIVE RIGHT HERE IN THE CITY WOULD
11 ALREADY HAVE ABOUT WHAT IS GOING ON IN THE CITY. THAT
12 WOULD BE ONE THING THAT I WOULD -- WOULD SAY.

13 GALLAGHER. THE SECOND THING IS -- IT HAS TO DO
14 WITH THE WHOLE IDEA ABOUT THE WORD CONTAMINATION IS THAT,
15 YOU KNOW, THERE'S A LOT OF PARENTS HERE WHO HAVE CHILDREN
16 WHO GO TO ST. PAUL, AND WHEN PEOPLE THINK CONTAMINATION, I
17 THINK THAT A LOT OF TIMES THEY'RE THINKING ABOUT NUCLEAR
18 CONTAMINATION, THE THREAT OF WHAT IS AIRBORN, WHAT IS
19 SOIL-BORN, AND I WAS LED TO UNDERSTAND IN OUR CONVERSATIONS
20 THAT ACTUALLY THAT WHATEVER CONTAMINATION THERE IS REALLY A
21 METALLIC CONTAMINATION FROM A VERY MINOR KIND OF A NORMAL
22 INDUSTRY OUTPUT LIKE OIL, SLUDGE THAT WAS A PART OF WHAT
23 WAS GOING ON HERE, AND ACTUALLY THAT WILL NOT OOZE FROM ONE
24 PIECE OF PROPERTY TO THE NEXT PIECE OF PROPERTY WITHOUT ANY
25 KIND OF A MAJOR CATASTROPHE.

1 MR. HARRIS-BISHOP: YEAH. LIKE I SAID, THE RISKS THAT
2 ARE POSED BY THE SITE CURRENTLY ARE VERY LOW, ALMOST WITHIN
3 WHAT E.P.A.'S CONSIDERS SAFE ALREADY. WHAT WE WANT TO MAKE
4 SURE WE DO IS BE PROTECTIVE IN THE LONG TERM AND IN THE
5 FUTURE, AND THAT'S WHY WE DON'T WANT TO WAIT UNTIL SOMEONE
6 STARTS TO DIG AND BECOMES EXPOSED TO ADDRESS THE PROBLEMS,
7 SO WE'RE TRYING TO BE PROTECTIVE AND PREVENTIVE IN THAT
8 RESPECT.

9 AS FAR AS, YOU KNOW, THE CITY OF SANTA FE SPRINGS
10 NOT BEING PROTECTIVE, I WOULDN'T SAY THAT AT ALL. RIGHT
11 NOW, LIKE I SAID, THIS IS, YOU KNOW, PROTECTIVE. THERE'S
12 NOT A RISK POSED BY THE SITE CURRENTLY, SO WHAT WE'RE DOING
13 IS THIS IS E.P.A.'S JOB IS TO ENSURE PROTECTIVENESS IN THE
14 LONG TERM, AND THAT'S WHAT WE'RE TRYING TO DO.

15 YES, MA'AM.

16 MS. AGUILAR: MY NAME'S VIRGINIA AGUILAR, AND FROM THE
17 FIELD OF ST. PAUL'S TO THE AREA YOU REFER TO, IT'S ABOUT
18 FIVE FEET HIGH IF YOU VIEW IT, SO YOU SAY THAT AREA IS FIVE
19 FEET. YOU'RE ALREADY -- THAT LEVEL WOULD BE CONTAMINATED,
20 AND THEN YOU'RE GOING TO BRING ALL THAT DIRT FROM ALL
21 AROUND IT AND PILE IT ON TOP AND THEN ANOTHER CAP. HOW
22 HIGH IS THIS GOING TO BE?

23 MR. HARRIS-BISHOP: I DON'T THINK WE'RE GOING TO BE
24 MORE THAN ABOUT A FOOT AND HALF ABOVE WHAT IS CURRENTLY
25 THERE, AND I THINK THAT'S AN OVERESTIMATE BECAUSE WE DO

1 HAVE -- IN THAT AREA IT'S NOT VERY SMOOTH, AND THE AREA
2 OVER AT ST. PAUL'S IS A LOT HIGHER, BUT THAT'S ALSO ADDED
3 SOIL THAT THEY BROUGHT IN WHEN THEY CLOSED THE SITE. YOU
4 KNOW, THE RESERVOIR WAS REMOVED FROM THIS HIGH SCHOOL
5 ATHLETIC FIELD, AND THEN THEY PILED DIRT ALL AROUND IT, AND
6 THEY BROUGHT IT UP TO ITS CURRENT SITE.

7 MS. AGUILAR: YOU SAID IT'S FIVE FEET AND THEN
8 CONTAMINATION. IT IS ABOUT FIVE FEET WHERE YOU'RE
9 STANDING.

10 MR. HARRIS-BISHOP: IT'S ACTUALLY -- IT'S FIVE FEET,
11 AND SO IF YOU LOOK AT IT FROM THE SIDE, WE'RE ALSO TALKING
12 AT LEAST FIVE FEET OF SOIL WAS BROUGHT IN ON THE INSIDE.
13 THEY MOSTLY DUMPED -- LET ME GET THE AERIAL PHOTOGRAPH.
14 EITHER WE DETECTED LEAKS OR STANDING LIQUIDS AROUND HERE
15 (INDICATING) BACK WHEN ALL THIS WAS LEVEL, AND THEN THEY
16 BROUGHT IN A LOT OF SOIL TO BRING IT TO THE CURRENT
17 CONFIGURATION. WHAT WE WANT TO DO IS WITH THE CAP COVER
18 ANY OF THAT AREA THAT'S ELEVATED FROM SANTA -- ST. PAUL'S
19 HIGH SCHOOL AND COVER IT WITH ASPHALT TO MAKE SURE THAT NO
20 ONE -- YOU KNOW, NONE OF THAT CONTAMINATION COULD SEEP
21 THROUGH. IT HASN'T, YOU KNOW, IN 30 YEARS SINCE IT'S BEEN
22 CLOSED, BUT WE WANT TO MAKE SURE THAT IT DOESN'T HAPPEN
23 UNDER SOME, YOU KNOW, CIRCUMSTANCES.

24 MS. AGUILAR: SO ACTUALLY IT'S GOING TO BE LIKE
25 CONTAMINATION AND THEN THE DIRT YOU PUT IN AND THEN THE

1 CONTAMINATION ON TOP OF THAT THAT'S ON THE SIDES AROUND
2 THERE?

3 MR. HARRIS-BISHOP: YEAH. LET ME --

4 MS. AGUILAR: SOUNDS GREAT.

5 MR. HARRIS-BISHOP: IT WILL LOOK LIKE -- WHAT WE HAVE
6 CURRENTLY HAVE IS THIS CONFIGURATION RIGHT HERE
7 (INDICATING), THIS CONTAMINATED SOIL AND THEN THE SOIL
8 THAT'S ON THE COVER. IN SOME PLACES, IT'S ACTUALLY ABOUT
9 15 FEET DEEP BEFORE WE DETECTED ANY CONTAMINATION, BUT
10 GENERALLY IT IS FIVE FEET.

11 MS. AGUILAR: AND THEN THE SOIL THAT'S CONTAMINATED,
12 YOU'RE GOING TO DIG IT OUT AND PUT IT ON TOP OF THAT. AND
13 THAT DOESN'T CAUSE DEBRIS AROUND, THAT WOULD BE LIKE
14 CLEANING IT OUT?

15 MR. HARRIS-BISHOP: IT WOULD BE -- IT'S A LOT LESS,
16 AND WE COULD CONTROL THAT WITH DUST SUPPRESSION EQUIPMENT.
17 WE'RE GOING TO HAVE TO MONITOR TO MAKE SURE WE'RE NOT
18 IMPACTING ANY AIR QUALITY. THAT'S ONE OF THE LAWS THAT WE
19 HAVE TO OBEY BY DOING THIS, SO WE'RE NOT GOING TO
20 CONTAMINATE OR CONTRIBUTE TO ANY FURTHER AIR CONTAMINATION
21 THAN ALREADY EXISTS. ALSO, WHAT WE'RE GOING TO BE DOING IS
22 WE'RE NOT GOING TO BE PUTTING IT RIGHT UP ALONG THIS
23 BOUNDARY HERE. WHAT WE WANT TO MAKE SURE IS THAT THE CAP
24 HAS UNIFORM DRAINAGE, SO IT'S GOING TO PROBABLY BE MOUNTED
25 IN THE CENTER HERE SO WE CAN HAVE SOME KIND UNIFORM

1 DRAINAGE ALONG THE EDGES, SO I DON'T THINK YOU'RE GOING TO
2 BE SEEING A LARGE INCREASE IN THE GRADE ABOVE SANTA FE
3 SPRINGS HIGH SCHOOL.

4 MR. OPALSKI: THERE'S ANOTHER ELEMENT ABOUT THE
5 CURRENT CONDITIONS, WHICH IS IF THIS IS -- IF THIS IS THE
6 SURFACE OF THE SOIL COVER THAT'S ON THERE RIGHT NOW? IT'S
7 NOT LIKE THIS (INDICATING).

8 MS. AGUILAR: NO, IT'S LIKE THIS (INDICATING).

9 MR. OPALSKI: ACTUALLY, IT'S SUPPOSED TO BE KIND OF
10 LIKE THAT, BUT IT'S ACTUALLY MORE LIKE GOT PITS IN IT.
11 IT'S A SURFACE THAT LOOKS MORE LIKE THAT (INDICATING), SO
12 WHEN WE'RE ADDING THE SOIL IN, PART OF THE POINT WILL BE TO
13 ADD IN THE EXCAVATED SOIL TO SMOOTH OUT THE SURFACE.

14 MR. CABRAL: ISN'T THAT CONTAMINATED STUFF YOU'RE
15 PUTTING IN NOW?

16 MR. OPALSKI: YEAH.

17 MR. HARRIS-BISHOP: LOW LEVEL CONTAMINATION, PROBABLY
18 AT A LEVEL THAT WOULDN'T EXCEED SHORT-TERM EXPOSURE WITH NO
19 RESTRICTION. WHAT WE WANT TO DO IS IF YOU'RE EXPOSED TO
20 THIS MATERIAL OVER A LONG PERIOD OF TIME, 70 YEARS LIVING
21 IN IT, YOU WOULD HAVE A POTENTIAL -- AN INCREASED RISK OF
22 CANCER.

23 MR. CABRAL: WHY NOT JUST GET IT AND TAKE IT OUT OF
24 THE AREA COMPLETELY?

25 MR. HARRIS-BISHOP: WE ACTUALLY LOOKED AT THAT, AND

1 THAT WAS THE FOURTH ALTERNATIVE. IT BECOMES A LOT MORE
2 EXPENSE, AND THEN WHAT WE'RE DOING IS WE'RE PUTTING IT INTO
3 A TRUCK, TRUCKING IT THROUGH YOUR NEIGHBORHOODS TO THE
4 FREEWAY TO THEN PUT IT INTO THE DIRT SOMEWHERE ELSE WHEN IT
5 REALLY POSES VERY LITTLE RISK RIGHT NOW. WHAT WE WANT TO
6 DO THOUGH -- THE REASON WE'RE EXCAVATING IT IS SO WE CAN
7 FREE UP THE PROPERTY THAT IS CONTAMINATED AND UNDEVELOPED
8 FOR SOME FURTHER DEVELOPMENT, BUT LIKE I WANT TO JUST POINT
9 OUT AND JUST REMIND EVERYONE THAT WHAT WE'RE TALKING ABOUT
10 HERE IS E.P.A.'S PROPOSED ALTERNATIVE, AND WE CAN LOOK AT A
11 LOT OF DIFFERENT ALTERNATIVES HERE. SOME OF THE THINGS
12 THAT WE'VE SPOKEN TO, AND I SPOKE TO THE CITY COUNCIL LAST
13 THURSDAY NIGHT AND SPOKE TO SOME OF THE PROPERTY OWNERS
14 THURSDAY AND THEN AGAIN TODAY, IS SOME KIND OF HYBRID OF
15 THAT, SO, YOU KNOW, IF WE WANT GRASS OVER A PORTION OF IT
16 AND ASPHALT OVER A PORTION OF IT, WE CAN WORK WITH THAT.
17 WHAT WE WANT TO DO IS MAKE SURE WE'RE PROTECTIVE, AND WE
18 HAVE A LOT OF ALTERNATIVES. ALL THESE ALTERNATIVES OFFER
19 VARYING DEGREES OF PROTECTION. WE FEEL THAT THIS ONE
20 MEETS -- THE MOST PROTECTIVE GOALS AND STILL MEETS WITH
21 ACCEPTANCE AND, YOU KNOW, FUTURE USE AND ECONOMIC
22 DEVELOPMENT OF THE AREA.

23 IF OUR PROPOSAL IS NOT ACCEPTABLE TO THE
24 COMMUNITY, THAT'S WHAT WE'RE HERE TO DISCUSS TONIGHT AND
25 TAKE YOUR COMMENTS ON, AND, YOU KNOW -- BECAUSE SINCE WE

1 HAVEN'T MADE OUR DECISION, WE'RE GOING TO GO BACK AND TAKE
2 YOUR COMMENTS AND THEN USE THOSE TO ADJUST OUR DECISION.

3 MS. HERRERA: RUSTY?

4 MR. HARRIS-BISHOP: YES, MA'AM.

5 MS. CAMERENE: MY NAME IS MARYSOL CAMERENE, AND THE
6 CONTAINMENT OPTION 3C, E.P.A.'S PREFERRED ALTERNATIVE, IF
7 THAT IS CHOSEN, HOW LONG WILL IT TAKE THAT WHOLE PROCESS TO
8 TAKE CARE OF THAT PREFERRED ALTERNATIVE? SECONDLY, WHO
9 WILL BE VOTING FOR IT, THE CITY OF SANTA FE SPRINGS? WHO
10 WILL DETERMINE THE ALTERNATIVE?

11 MR. HARRIS-BISHOP: THIS IS AN E.P.A. PROJECT, SO
12 E.P.A. WILL BE MAKING THIS DECISION ALONG WITH THE
13 COMMUNITY, AND THAT'S WHY WE'RE HERE TO MAKE THIS DECISION
14 OR START MAKING THIS DECISION TONIGHT. WE ENVISION -- WHAT
15 WE'LL DO IS ONCE WE MAKE OUR DECISION AND WRITE UP THAT
16 RECORD OF DECISION, WE HAVE TO LET EVERYONE KNOW THAT WE
17 MADE THE DECISION AND THEN GIVE THE PEOPLE THAT WE
18 DETERMINE MAY BE POTENTIALLY RESPONSIBLE FOR THE
19 CONTAMINATION TO COME FORWARD, AND WE HAVE TO GIVE THEM THE
20 OPPORTUNITY TO DO THIS WORK FOR US. SO FAR E.P.A. HAS DONE
21 IT. WE PROPOSED TO THE POTENTIALLY RESPONSIBLE PARTY BACK
22 IN '88 TO HAVE THEM DO THE WORK, AND WE DIDN'T HAVE ANYONE
23 COME FORWARD AND AGREE TO DO THIS WORK, SO E.P.A., WE WENT
24 FORWARD AND DID IT.

25 WE WILL AGAIN GO FORWARD AND ASK THEM TO

1 IMPLEMENT THIS DESIGN AND THE REMEDIAL ACTION, AND IF WE
2 DON'T GET ANY TAKERS, E.P.A. WILL AGAIN DO IT, AND WE HOPE
3 TO START -- WE HAVE, YOU KNOW, STATUTORY LIMITS. WE HAVE
4 TO GIVE PEOPLE AT LEAST, I THINK, 60 DAYS INITIALLY AND
5 THEN ANOTHER 60 DAYS AFTER THAT, SO IT WOULD BE AT LEAST
6 FOUR MONTHS AFTER WE STARTED BEFORE WE COULD DO ANYTHING,
7 BUT I'D ENVISION US GETTING STARTED BY EARLY -- BY THE
8 MIDDLE OF NEXT YEAR. PROBABLY MARCH OR APRIL TIME FRAME
9 WOULD PROBABLY BE THE EARLIEST WE CAN GET STARTED.

10 YES, FATHER.

11 FATHER GALLAGHER: A QUESTION ABOUT THE ENCAPSULATION
12 OF THAT AREA. WHEN WE HAD OUR DISCUSSION, YOU LED ME TO
13 BELIEVE THAT IF THE AREA REMAINED GRASSY, THEN NOTHING
14 COULD REALLY OCCUR ON THAT -- ON THAT PROPERTY IN TERMS OF
15 ANY KIND OF BUSINESS VENTURE.

16 MR. HARRIS-BISHOP: YEAH, BECAUSE WE --

17 FATHER GALLAGHER: IN THE FUTURE. BUT IF IT'S
18 ASPHALTED, THEN IT COULD BE USED FOR SOME KIND OF A LIMITED
19 BUSINESS VENTURE.

20 MR. HARRIS-BISHOP: YEAH.

21 FATHER GALLAGHER: FOR EXAMPLE.

22 THEN I WAS WONDERING ABOUT THE SAFETY. FOR
23 EXAMPLE, IF YOU HAVE A SCHOOL YARD OR A PLAYING FIELD WHERE
24 THERE ARE CONSISTENTLY STUDENTS PLAYING AND A HIGHER
25 ELEVATED ASPHALT COVERED AREA PROPERTY THAT COULD BECOME

1 ANY NUMBER OF DIFFERENT THINGS WHERE WE WOULD CONTINUALLY
2 HAVE TO BE WORRIED OF LOOKING UP AND WONDERING WHAT IS --
3 WHAT COULD POSSIBLY BE COMING FROM THAT HIGHER ELEVATION AT
4 ALL, I THINK THERE WOULD BE SOME LIABILITY ON THE PART OF
5 THE GOVERNMENT FOR AC -- OR FOR PUTTING IN SOMETHING WHERE
6 WE WOULD BE CONCERNED ABOUT -- I WOULD ALWAYS BE CONCERNED
7 ABOUT WELL, WHAT'S HAPPENING OVER THERE WHICH WE HAVE NO
8 CONTROL OVER? I WOULD HAVE CONTROL OVER WHO WAS ON OUR
9 PROPERTY, BUT I WOULDN'T HAVE CONTROL OVER WHO IS STANDING
10 ON THE -- ON THE PIECE OF PROPERTY ABOVE US LOOKING DOWN AT
11 THE STUDENTS WHO ARE UNPROTECTED. SO, YOU KNOW, IT'S
12 SIMPLY A QUESTION OR A COMMENT, BUT I DO THINK THAT THERE'D
13 SOME GOVERNMENTAL LIABILITY IF SOMETHING WERE TO OCCUR.

14 MR. HARRIS-BISHOP: OKAY. LET ME SAY THAT IS A GOOD
15 COMMENT THAT WE PROBABLY SHOULD, YOU KNOW, ADDRESS OR AT
16 LEAST HAVE RECORDED AGAIN DURING THE FORMAL COMMENT
17 PERIOD. I GUESS WE MAY BE MOVING INTO THAT PERIOD ANYWAY.
18 LET ME -- IF YOU'D LIKE TO BRING THAT UP AGAIN -- UNLESS
19 WE'RE FINISHED WITH QUESTIONS.

20 MS. HERRERA: ACTUALLY, I THINK WE WILL PROBABLY WANT
21 TO COME BACK TO QUESTIONS BECAUSE WE WANT TO MAKE SURE WE
22 TAKE ALL THE COMMENTS. SO WHY DON'T WE OPEN THE COMMENT
23 PERIOD RIGHT NOW, AND IF WE HAVE TIME AFTER THE COMMENT
24 PERIOD, THEN WE CAN COME BACK TO THE QUESTIONS.

25 MR. HARRIS-BISHOP: AND I'LL BE -- WE'LL BE HERE AS

1 LATE AS YOU ALL NEED US TO BE TO ANSWER QUESTIONS, SO WE'RE
2 NOW OFFICIALLY IN THE FORMAL COMMENT PERIOD.

3 MS. HERRERA: AND WE WILL NOT RESPOND TO YOUR COMMENTS
4 TONIGHT.

5 MR. SHARP: ALBERT SHARP, AND THIS IS REALLY A
6 QUESTION. WHY WASN'T BIO REMEDIATION PUT IN THERE AS ONE
7 OF THE ALTERNATIVES? IT'S A METHOD WE'VE USED SUCCESSFULLY
8 OF CLEANING UP SOME OF THE OIL PROPERTIES IN THE CITY THE
9 CITY WANTED TO REDEVELOP DURING THE REDEVELOPMENT AGENCY.
10 I DON'T SEE THAT LISTED AS ANY TYPE OF ALTERNATIVE, YET
11 IT'S PROBABLY THE MOST SUCCESSFUL METHOD CURRENTLY USED
12 THROUGHOUT THE WORLD.

13 MR. HARRIS-BISHOP: WE DID ACTUALLY LOOK AT BIO
14 REMEDIATION THE PROBLEM IS WE HAVE ARSENIC IN THE SOIL AT
15 ELEVATED LEVELS THAT IS NOT GOING -- BIO REMEDIATION ISN'T
16 GOING TO DO ANYTHING ABOUT THAT.

17 MR. SHARP: BUT IF WE CLEANED UP EVERYTHING EXCEPT THE
18 ARSENIC, THEN IT WOULD BE A SIMPLE THING TO ISOLATE AND
19 REMOVE.

20 MR. HARRIS-BISHOP: ACTUALLY, THAT'S THE WHOLE POINT
21 IS THAT WE HAVE ARSENIC THROUGHOUT THIS SITE, AND ARSENIC
22 IS WHAT DRIVES THIS WHOLE RISK, SO THAT WE COULDN'T -- I
23 MEAN WE HAVE ARSENIC IN ALMOST EVERY SOIL BORING THAT'S AT
24 ELEVATED LEVELS FOR A HEALTH CONCERN SO THAT WE COULDN'T
25 ISOLATE ARSENIC. BASICALLY WE'D BE EXCAVATING THAT

1 ENTIRE -- THE ENTIRE SITE SINCE BIO REMEDIATION IS GOING ON
2 ALREADY TO SOME EXTENT. THAT'S THE REASON WHY METHANE IS
3 BEING GENERATED. IT'S TAKING CARE OF THE ORGANIC
4 CONSTITUENTS, WHICH ISN'T THE MAIN FACTOR IN THE RISK. THE
5 MAIN FACTOR IN THE RISK HAS BEEN THE METALS AS FAR AS --
6 THAT'S WHAT I'VE DETERMINED SO FAR.

7 DID YOU HAVE A QUESTION OR A COMMENT, MISS?

8 MS. CAMERENE: MARYSOL CAMERENE. IN WHAT PHASE DID
9 YOU CHOOSE THE 3C ALTERNATIVE, BECAUSE IT IS LESS
10 EXPENSIVE?

11 MR. HARRIS-BISHOP: NO. IT'S ACTUALLY ABOUT -- WE
12 LOOK AT -- IN THE FACT SHEET WE TALK ABOUT SELECTING A
13 REMEDY, AND WE LOOK AT NINE CRITERIA. COST IS ONLY ONE OF
14 THEM. COMMUNITY ACCEPTANCE IS ALSO ONE OF THEM. THE FIRST
15 ONE WE LOOK AT IS TO BE PROTECTIVE, AND THIS ALTERNATIVE IS
16 PROTECTIVE. THEN WE LOOK AT -- IF YOU WANT TO GO THROUGH
17 THEM WITH ME IF EVERYONE HAS A COPY. THEN THE NEXT ONE IS
18 COMPLIANCE WITH A.R.A.R.S., WHICH ARE THE REGULATIONS WE
19 HAVE TO COMPLY WITH WHILE WE'RE DOING OUR WORK; LONG-TERM
20 EFFECTIVENESS, WHICH I SAID IS WHY WE'RE DOING THIS RATHER
21 THAN JUST WAITING UNTIL SOMEONE BECOMES EXPOSED. THIS IS
22 PROTECTING THE LONG TERM.

23 REDUCTION OF TOXICITY, MOBILITY OR VOLUME IS
24 ANOTHER ALTERNATIVE WE NORMALLY LOOK AT WHICH INVOLVES A
25 TREATMENT OPTION. WE DID EVALUATE DIFFERENT TREATMENT

1 ALTERNATIVES, BUT NONE OF THEM WERE EFFECTIVE FOR REDUCING
2 THE TOTAL RISK THAT WE HAVE AT THIS SITE. WE ARE GOING TO
3 BE REDUCING SOME OF THAT VOLUME THROUGH THE GAS TREATMENT
4 SYSTEM IF THAT'S NECESSARY. WE'RE ALSO REDUCING MOBILITY
5 BECAUSE WE'RE PREVENTING WATER FROM FLUSHING ANY
6 CONTAMINANTS INTO THE GROUNDWATER. THEN COST, SHORT-TERM
7 EFFECTIVENESS, IMPLEMENTABILITY, WHICH MEANS ARE WE TALKING
8 ABOUT TRYING TO BUILD SOMETHING THAT'S REALLY DIFFICULT.
9 ASPHALT PAVING IS A FAIRLY COMMON PRACTICE, SO WE WOULDN'T
10 HAVE THAT IMPLEMENTABLE PROBLEM, AND THEN THE LAST TWO ARE
11 STATE AND COMMUNITY ACCEPTANCE, SO WE TAKE A LOOK AT ALL
12 THESE CRITERIA IN MAKING OUR DECISION, AND THERE'S ACTUALLY
13 A TABLE IN THE FEASIBILITY STUDY THAT SAYS HOW WE FEEL THAT
14 EACH OF THESE SEVEN MEETS THESE CRITERIA, AND SO IF YOU
15 FEEL THAT ONE COMPONENT OF OUR -- AN ALTERNATIVE WOULD WORK
16 BETTER, THAT'S WHAT WE'D LIKE TO HEAR FROM YOU.

17 I ALSO WANT TO STRESS IF YOU DON'T WANT TO MAKE
18 YOUR COMMENTS EARLIER TODAY, THE COMMENT PERIOD GOES UNTIL
19 SEPTEMBER 12, AND WE ACCEPT WRITTEN COMMENTS, AND MY
20 ADDRESS IS ON THE BACK OF THE FACT SHEET, SO YOU CAN JUST
21 WRITE A LETTER TO ME. YOU CAN HANDWRITE IT; IT DOESN'T
22 MATTER. AND SEND IT TO ME, AND THAT WILL BE INCORPORATED
23 INTO OUR RECORD OF DECISION, AND THEN I'LL BE ADDRESSING
24 THOSE COMMENTS AS WELL AS ANY OF THE COMMENTS THAT WE'RE
25 HAVING HERE TONIGHT.

1 MR. CABRAL: ON THAT GAS YOU WERE PICKING UP, HOW ARE
2 THEY GOING TO EXPOSE IT, GET RID OF IT?

3 MR. HARRIS-BISHOP: WE'LL BE FLARING IT SINCE IT'S
4 METHANE IS THE PREDOMINANT --

5 MR. CABRAL: DOESN'T THAT MAKE A GREAT NOISE?

6 MR. HARRIS-BISHOP: BURNING METHANE?

7 MR. CABRAL: YES.

8 MR. HARRIS-BISHOP: NO. IT'S GOING TO BE LIKE A SMALL
9 BURNER. IT SHOULDN'T HAVE ANY EFFECT -- IT SHOULDN'T BE
10 VERY NOISY.

11 MR. CABRAL: THE ONES UP AT ROSE HILLS, THAT MAKES A
12 LOT OF NOISE.

13 MR. HARRIS-BISHOP: THE VOLUME THAT WE'RE TALKING
14 ABOUT IS A LOT SMALLER METHANE. IN FACT, WE MAY NOT EVEN
15 HAVE ENOUGH METHANE TO IGNITE, SO WE'LL HAVE -- THOSE ARE
16 GOING TO BE THINGS THAT WE HAVE TO EVALUATE.

17 MR. CABRAL: IN OTHER WORDS, YOU'RE GOING TO SAVE IT
18 AND LET IT GO INTO THE AIR.

19 MR. HARRIS-BISHOP: I DON'T KNOW IF WE'RE ALLOWED TO
20 DO THAT BASED ON THE AIR QUALITY IN THIS AREA. IF IT ISN'T
21 CONSIDERED TO BE AN ADDITIONAL, YOU KNOW, CONTAMINANT --
22 I'M SURE IT WOULD BE THOUGH. WE WOULD HAVE TO DO
23 SOMETHING, EITHER CONTAIN IT AND HAUL IT OFF-SITE OR ELSE
24 IGNITE IT WHENEVER IT BECOMES INTO THAT KIND OF
25 CONCENTRATION.

1 MR. CABRAL: SO THAT WOULD BE MAKING A GREAT NOISE.

2 MR. HARRIS-BISHOP: I DON'T -- IT'S LIKE A GAS BURNER
3 ON YOUR OVEN. WE'RE NOT TALKING ABOUT A LARGE VOLUME OF
4 GAS HERE.

5 MR. CABRAL: I'VE WORKED ON THE ONE IN ROSE HILLS, AND
6 THAT MAKES A LOT OF NOISE.

7 MR. HARRIS-BISHOP: THAT'S A LEGITIMATE COMMENT THAT
8 WE'LL LOOK INTO.

9 MS. HERRERA: RUSTY, WE'RE RUNNING OUT OF TIME, SO WE
10 WANT TO MAKE SURE EVERYBODY HAS A CHANCE TO EXPRESS THEIR
11 COMMENTS, AND IF WE HAVE EXTRA TIME, THEN WE'RE GOING TO GO
12 BACK TO THE QUESTION AND ANSWER SESSION.

13 MR. HARRIS-BISHOP: I THINK THOSE ARE GOOD COMMENTS.

14 MS. HERRERA: RIGHT NOW WE'D LIKE TO ENCOURAGE ANYONE
15 THAT HAS ANY COMMENTS TO STATE THEM FOR THE RECORD.

16 MS. AGUILAR: WHEN IS THE FINAL DECISION?

17 MR. HARRIS-BISHOP: WE'RE HOPING TO MAKE THAT BY THE
18 END OF SEPTEMBER. ONCE THIS PUBLIC COMMENT PERIOD IS OVER,
19 WE'LL TAKE ALL THE COMMENTS THAT WE HAVE, AND WE'LL ADDRESS
20 THEM ALL, AND THEN WE WRITE OUR RECORD OF DECISION, WHICH
21 INCLUDES, YOU KNOW, THE SITE BACKGROUND, THE RESPONSIVENESS
22 SUMMARY TO ALL THE COMMENTS, AND IF IT'S SIGNIFICANTLY
23 DIFFERENT FROM OUR PROPOSED PLAN, WE'LL WRITE DOWN WHAT THE
24 SIGNIFICANT DIFFERENCES ARE IN THAT.

25 MS. AGUILAR: SO IF CITIZENS DECIDE THAT THEY DON'T

1 AGREE WITH YOU, HOW DO THEY -- WOULD IT BE LIKE EACH
2 INDIVIDUAL PERSON OR ONE BIG GROUP OR HOW DO YOU DO THAT?

3 MS. HERRERA: YOU CAN --

4 MR. HARRIS-BISHOP: ACTUALLY, YOU CAN SUBMIT LETTERS
5 TO ME INDIVIDUALLY OR, YOU KNOW, IF YOU HAVE A NEIGHBORHOOD
6 COMMUNITY GROUP OR SOMETHING LIKE THAT, YOU COULD SUBMIT A
7 LETTER UNDER THEM WITH THE UNDERSIGNED OR SOMETHING. IT'S
8 NOT -- IT'S MORE WHAT THE -- THE COMMENT IS. IF IT'S
9 SOMETHING THAT, YOU KNOW, YOU'RE JUST DRAMATICALLY OPPOSED
10 TO US DOING, THEN WE HAVE TO LOOK AT DOING SOMETHING
11 DIFFERENT. IT'S A TRADEOFF, AND THAT'S WHY I PRESENTED ALL
12 SEVEN OF THESE BECAUSE ALL OF THESE HAVE, YOU KNOW,
13 ACCEPTABILITY AND UNACCEPTABLE ELEMENTS OF IT, SO E.P.A., I
14 THINK -- EXCEPT FOR THE NO ACTION ALTERNATIVE, ALL OF THESE
15 OFFER SOME LEVEL OF PROTECTION THAT -- WITH THE, YOU KNOW,
16 PROPER CONTROL. SOME OF THEM MAY TAKE MORE WORK AS FAR AS
17 THE CITY CONTROLLING IT OR THE STATE COMING IN AND, YOU
18 KNOW, MONITORING IT OR E.P.A. DOING MORE WORK TO BE
19 PROTECTIVE, BUT ALL OF THESE OFFER A LEVEL OF PROTECTION,
20 AND IT'S LISTED IN THE FACT SHEET SO THAT WE CAN -- OUR
21 GOAL TO BE PROTECTIVE, BUT WE ALSO WANT TO MEET COMMUNITY
22 NEEDS, SO IF THE COMMUNITY IS OPPOSED TO THIS, WE'LL TAKE
23 THOSE -- THAT COMMENT BACK, AND WE'LL WORK WITH IT AT OUR
24 OFFICE.

25 AND THEN -- I MEAN THIS ISN'T THE FINAL PART OF,

1 YOU KNOW, THE COMMUNITY INVOLVEMENT. ONCE WE WRITE OUR
2 RECORD OF DECISION, WE'LL LET EVERYONE KNOW WHAT THAT
3 DECISION IS. WHEN WE IMPLEMENT DESIGN, WHEN WE START DOING
4 THE DESIGN WORK, WHICH WILL BE IN PHASES, WE'LL BE LETTING
5 PEOPLE KNOW HOW THE DESIGN IS GOING, WHAT WE PROPOSE TO DO
6 AND HOW THE DESIGN IS COMING OUT, AND PEOPLE WOULD HAVE THE
7 OPPORTUNITY TO COMMENT AGAIN AT THAT TIME, SO IT'S -- THIS
8 IS ONLY THE START OF, YOU KNOW, THE PROCESS.

9 MS. AGUILAR: I HAVE A SMALL QUESTION BETWEEN 3C AND
10 3D. NOW, IT SAYS -- ON BOTH OF THEM IT SAYS LIMITED
11 EXCAVATION. ON THE ONE THAT YOU PROPOSE, IS THAT THE ONE
12 WHERE YOU TAKE THE STUFF AROUND AND PILE IT IN THE MIDDLE?

13 MR. HARRIS-BISHOP: YEAH.

14 MS. AGUILAR: AND THEN THE THIRD ONE IS THE ONE WHERE
15 YOU JUST CAP EVERYTHING IN GENERAL?

16 MR. HARRIS-BISHOP: THE SECOND ONE ACTUALLY, THE ONE
17 THAT SAYS ASPHALT CAP-NO EXCAVATION? WE'D BE CAPPING ANY
18 AREA THAT HAD -- THAT ISN'T ALREADY PAVED ON THAT SITE
19 BASICALLY.

20 MS. AGUILAR: SO IT WOULD BE THE WHOLE ENTIRE PLACE,
21 INCLUDING SOME OF THE PINK SITES YOU HAVE THERE. SO IT
22 WOULD BE 3B, NO EXCAVATION.

23 MR. HARRIS-BISHOP: YEAH. AND THEN 3A IS ALSO A NO
24 EXCAVATION ALTERNATIVE WHERE WE'D HAVE JUST SOIL AND
25 VEGETATION EVERYWHERE RATHER THAN ASPHALT.

1 MS. AGUILAR: IN OTHER WORDS, PLANTS AND STUFF.

2 MR. HARRIS-BISHOP: PLANTS, GRASS. PROBABLY NICER
3 THAN THE STUFF RIGHT NOW THAT'S THERE. WE'VE GOT ALL THOSE
4 WEEDS. WE WOULD VEGETATE SO IT WOULD BE A LOW MAINTENANCE
5 AREA.

6 MS. AGUILAR: BETWEEN C AND D, I DIDN'T QUITE GET
7 THAT. ONE HAS ASPHALT, AND THE OTHER ONE JUST HAS --
8 WHAT'S --

9 MR. HARRIS-BISHOP: ACTUALLY, THE R.C.R.A. CAP WHICH
10 IS DESCRIBED IN THE REGULATIONS IS MORE LEVELS, MORE LAYERS
11 BETWEEN THE ASPHALT CAP AND THE -- AND THE BOTTOM. THERE'S
12 ACTUALLY AN OPTION UNDER A R.C.R.A. CAP TO MAKE SOIL ON TOP
13 OF EVERYTHING ELSE, SO WE WOULD HAVE THESE ADDITIONAL
14 BARRIERS, BASICALLY MORE PLASTIC LAYERS AND MORE ROCK
15 LAYERS, AND THEN WE'D HAVE EITHER ASPHALT OR SOIL ON TOP OF
16 THAT, BUT LIKE I SAID, THAT'S AT LEAST FIVE FEET THICK, THE
17 R.C.R.A. CAP, SO THAT JUST ADDS A HUGE, AN EVEN LARGER
18 GRADE ABOVE THE SCHOOL AND ABOVE THE REST OF THE PROPERTY,
19 BUT WE DID EVALUATE THAT, AND THAT'S INCLUDED IN THE FACT
20 SHEET, THE COSTS.

21 IF I CAN JUST TAKE A BREAK. I NEED TO RUN AND
22 GET A GLASS OF WATER OR GET A DRINK.

23 MR. OPALSKI: ANY OTHER COMMENTS?

24 MS. HERRERA: ANY OTHER COMMENTS?

25 FATHER GALLAGHER: ARE YOU ON THE COMMENT SECTION?

1 MS. HERRERA: YEAH, COMMENT SECTION.

2 FATHER GALLAGHER: I UNDERSTOOD THE COMMENT SECTION

3 WAS GOING TO HAVE NO ANSWERS TO IT, SO . . .

4 MS. HERRERA: THAT'S RIGHT. SO THIS IS A GOOD TIME

5 FOR THE COMMENT SECTION. I'M HAVING A HARD TIME KEEPING

6 RUSTY QUIET.

7 FATHER GALLAGHER: WHICH SECTION IS WHICH SECTION?

8 MS. HERRERA: THIS IS THE COMMENT PERIOD SO GO AHEAD

9 AND STATE YOUR COMMENTS IF YOU HAVE ANY.

10 MR. SHARP: MY NAME'S ALBERT SHARP. ONCE AGAIN, I

11 THINK THERE ARE MORE OF THE PEOPLE HERE -- I THINK WE HAVE

12 MORE QUESTIONS WE WANT TO ASK, AND I DON'T KNOW THAT THE

13 COMMENTS REALLY MATTER TO US AT THIS POINT IN TIME.

14 MR. HARRIS-BISHOP: OKAY.

15 MR. SHARP: WE CAME HERE TO ASK SPECIFIC QUESTIONS,

16 AND I THINK WE OUGHT TO SACK THE COMMENT PERIOD AND ASK THE

17 QUESTIONS SO THE NEIGHBORS COULD HAVE THEM ANSWERED.

18 I HAVE A QUESTION -- ALBERT SHARP IS ASKING THE

19 QUESTION -- DO YOU HAVE THE MONEY? DO YOU HAVE FIVE AND A

20 HALF MILLION TO SPEND ON THIS 3C?

21 MR. HARRIS-BISHOP: WE DON'T HAVE IT RIGHT NOW. WHAT

22 WE HAVE TO DO IS GET IT FROM E.P.A. HEADQUARTERS AND MAKE

23 SURE THAT IT'S BUDGETED BY CONGRESS.

24 MR. SHARP: AND WHAT IS THE LIKELIHOOD OF THAT

25 HAPPENING IN MY LIFETIME?

1 MR. HARRIS-BISHOP: IT'S VERY GOOD. WE ARE NOT
2 TALKING ABOUT -- E.P.A. MANAGEMENT HAS APPROVED OF THIS SO
3 FAR, SO I MEAN IT'S NOT SOMETHING THAT IS THAT
4 CONTROVERSIAL AS FAR AS E.P.A. IS CONCERNED THAT WE'RE
5 GOING TO BE SPENDING A LOT OF MONEY THAT MAY NOT BE
6 EFFECTIVE. I DON'T THINK -- I DON'T ENVISION THAT BEING A
7 PROBLEM. WE CLEAN UP -- WE'RE DOING THIS KIND OF WORK ALL
8 OVER THE STATE, ALL OVER THE COUNTRY.

9 YES, MA'AM.

10 MS. CABRAL: IRENE CABRAL. SO WHO IS GOING TO MAKE
11 THE FINAL DECISION WHAT IS GOING TO BE DONE, E.P.A.,
12 COUNCIL?

13 MR. HARRIS-BISHOP: E.P.A. DOES BECAUSE WE'RE THE LEAD
14 AGENCY, AND THIS IS OUR JOB TO MAKE THESE DECISIONS, BUT
15 WHY WE'RE HERE IS TO BRING THE PUBLIC INTO THE
16 DECISION-MAKING PROCESS, AND THAT'S --

17 MS. CABRAL: BUT THEY'RE NOT GOING TO HAVE THE FINAL
18 DECISION, THE PUBLIC.

19 MR. HARRIS-BISHOP: THAT'S WHY WE'RE HERE TONIGHT.

20 MS. CABRAL: YOU'RE JUST GOING TO TAKE COMMENTS.

21 MR. HARRIS-BISHOP: AND THAT AFFECTS OUR DECISION. IF
22 EVERYONE SAYS, YOU KNOW, "NO, WE DON'T WANT YOU TO DO
23 THIS," THAT'S SOMETHING THAT WE HAVE TO TAKE INTO ACCOUNT,
24 AND WE CAN'T JUST GO AGAINST THE COMMUNITY IN IMPLEMENTING
25 THIS AND MAKING OUR DECISION AND JUST GOING ON. THAT'S WHY

1 WE'RE HERE BECAUSE WE WANT TO MAKE SURE THE COMMUNITY
2 ACCEPTS WHAT WE'RE DOING AND THAT THEY HAVE PARTICIPATION
3 IN THE PROCESS.

4 YES, SIR, MR. CABRAL.

5 MR. CABRAL: I DON'T LIVE IN SANTA FE SPRINGS. I LIVE
6 IN SOUTH WHITTIER.

7 MR. HARRIS-BISHOP: THAT'S FINE.

8 MR. CABRAL: BUT I'M QUITE CONCERNED ABOUT WHAT'S
9 HAPPENING HERE, AND IS MY VOTE GOING TO BE COUNTED OR IS IT
10 GOING TO BE JUST THE PEOPLE THAT LIVE AROUND IT?

11 MR. HARRIS-BISHOP: WELL, I THINK THAT ACTUALLY THE
12 BOUNDARY OF SANTA FE SPRINGS STOPS AROUND THE SITE. WHAT
13 WE'RE CONCERNED WITH IS PEOPLE WHO ARE AFFECTED BY THE
14 SITE.

15 MR. CABRAL: YEAH, BUT IT'S ALL CONSTRUCTION AROUND
16 IT, AND THERE'S A SCHOOL, AND FATHER GALLAGHER AND BROTHER
17 DENNIS ACTUALLY LIVE IN THERE AND MAYBE A DOZEN OTHER
18 PEOPLE. BUT ON THE OTHER SIDE ACROSS THE STREET, ARE THEY
19 GOING TO HAVE A CHANCE TO VOTE, AND IF THEY KNOW NOTHING
20 ABOUT IT, HOW ARE THEY GOING TO MAKE A DECISION?

21 MR. OPALSKI: LET ME CLARIFY THAT IT'S NOT REALLY A
22 VOTE.

23 MR. CABRAL: THEN WHY ARE WE HERE THEN?

24 MR. OPALSKI: BECAUSE THE COMMENTS DO MAKE A
25 DIFFERENCE.

1 MR. CABRAL: I MEAN IF YOU'RE GOING TO DO IT
2 REGARDLESS WHAT YOU'RE GOING TO DO, WE'RE WASTING OUR TIME
3 BEING HERE.

4 MR. OPALSKI: WE'RE GOING TO CONSIDER ALL THE COMMENTS
5 NO MATTER WHERE THEY COME FROM.

6 MR. CABRAL: IN OTHER WORDS, WHAT YOU'RE SAYING IS
7 WHATEVER WE SAY IS NOT GOING TO MAKE ANY DIFFERENCE.

8 MR. OPALSKI: NO, THAT'S NOT WHAT I'M SAYING. I'M
9 SAYING WE'RE GOING TO CONSIDER ALL THE COMMENTS.

10 MR. CABRAL: BUT THAT'S ALSO WHAT I'M SAYING. HOW
11 MANY PEOPLE IS IT GOING TO TAKE TO MAKE A DECISION IF WE
12 DON'T WANT IT?

13 MR. OPALSKI: WELL, THIS IS ANOTHER THING I WANT TO
14 CLARIFY. IF YOU ARE NOT LIKING THE PREFERRED ALTERNATIVE,
15 WE NEED TO HEAR MORE THAN THAT YOU JUST DON'T LIKE IT. WE
16 NEED TO HEAR WHY BECAUSE THERE ARE OTHER CRITERIA WE HAVE
17 TO LOOK AT ASIDE FROM COMMUNITY ACCEPTANCE, FOR INSTANCE,
18 PROTECTIVENESS. WE HAVE A BASELINE RESPONSIBILITY TO MAKE
19 SURE THIS REMEDY IS PROTECTIVE ESSENTIALLY NO MATTER WHAT
20 OTHER PEOPLE ARE FEELING ABOUT IT, SO IF IN OUR
21 PROFESSIONAL JUDGMENT IT'S SOMETHING THAT OTHER PEOPLE ARE
22 WANTING THAT'S NOT PROTECTIVE, WE ARE OTHERWISE BOUND NOT
23 TO ALLOW THAT TO GO FORWARD, OKAY? SO IT'S -- COMMUNITY
24 ACCEPTANCE IS ONE OF THE CRITERIA WE LOOK AT, AND,
25 THEREFORE, WE WANT TO LOOK AT ALL THE COMMENTS THAT COME

1 IN. IT DOESN'T REALLY MATTER WHERE YOU LIVE. WE CONSIDER
2 ALL THE COMMENTS.

3 YES, MA'AM.

4 MS. AGUILAR: VIRGINIA AGUILAR. MY COMMENT IS THAT
5 THE -- WE HAVE CHILDREN PLAYING OUT THERE EVERY DAY HARD,
6 BREATHING HARD, BREATHING THAT GAS YOU'RE GOING TO PUT UP
7 IN THE AIR HARD RIGHT NEXT TO IT. I'M TALKING A FEW FEET
8 FROM THERE. WHY CAN'T THEY JUST CLEAN IT? CLEAN IT.

9 MR. HARRIS-BISHOP: THIS IS JUST COMMENT. WELL, I
10 WOULD LIKE TO ADDRESS IT JUST TO SAY I EXPLAINED IT
11 EARLIER. BY DIGGING THAT UP, WE'RE CAUSING A MUCH HIGHER
12 SHORT-TERM RISK THAT WE'RE NOT GOING TO BE ELIMINATING, YOU
13 KNOW, ULTIMATELY THAT MUCH OF A RISK FOR THE AMOUNT OF WORK
14 AND THE AMOUNT OF MONEY THAT THAT COSTS. I MEAN IT'S
15 ENORMOUSLY EXPENSIVE, 20 TIMES --

16 MR. CABRAL: HOW MUCH IS --

17 MR. HARRIS-BISHOP: AND WHAT WE HAVE RIGHT HERE IS WE
18 DON'T HAVE A CURRENT RISK. WE DON'T HAVE A RISK POSED TO
19 THE PEOPLE, THE STUDENTS, AND MARILYN UNDERWOOD IS A
20 TOXICOLOGIST WHO HAS REVIEWED THIS FOR THE STATE AND HAS
21 THE SAME OPINION, THAT THE CURRENT RISK TO THIS SITE --
22 POSED BY THE SITE ARE VERY LOW, AND WHAT WE WANT TO DO IS
23 MAKE SURE THAT OUR REMEDY AND WHATEVER DECISION THAT WE
24 COME TO IS PROTECTIVE, AND THAT'S OUR FIRST GOAL. RIGHT
25 NOW THERE'S NOT A CURRENT RISK PROPOSED BY THE SITE.

1 MR. MORENO: I HAVE A COMMENT AND A QUESTION.

2 MR. HARRIS-BISHOP: YES, SIR.

3 MR. MORENO: THAT'S WHAT OFFICIALS AND COMPANY OWNERS
4 AND FACTORY OWNERS SAID IN TEXAS, THAT THERE WAS NO RISK,
5 SO THAT'S MY COMMENT. AND I HAVE A QUESTION. DURING THE
6 PERIOD OF EXCAVATION, THE KIDS, THEY'RE GOING TO BE EXPOSED
7 TO THE GASES, ESPECIALLY MORE THAN THE TIME THAT IT'S
8 COVERED UP. WOULD THEY BE CLOSING THE SCHOOL DURING THAT
9 PERIOD OF TIME OR -- I KNOW IT MAY NOT BE A QUESTION FOR
10 YOU, BUT THAT WOULD BE MY CONCERN.

11 MR. HARRIS-BISHOP: WHAT WE'RE DOING -- THAT'S A
12 CONCERN OF OURS TOO, TO MAKE SURE THAT WE'RE NOT IMPACTING
13 ANYBODY'S HEALTH AND ANYBODY'S BUSINESS, SO WHAT WE'RE
14 GOING TO DO IS WORK WITH THE SCHOOL TO MAKE SURE -- WE
15 COULD DO THIS EXCAVATION DURING NON-SCHOOL YEAR. I MEAN
16 SCHOOL'S OUT FOR A COUPLE MONTHS IN THE SUMMER. WE CAN DO
17 IT, YOU KNOW, ALONG WITH ANYONE ELSE'S PLANS IF THERE'S
18 SOMETHING THAT'S IMPACTING ACROSS THE STREET AT THE
19 BUSINESS NEXT STORE. WHAT WE ARE GOING TO BE DOING THOUGH
20 IS TAKING PRECAUTIONS WITH DUST SUPPRESSION TO LIMIT THE
21 AMOUNT OF DUST THAT IS GENERATED. WE HAVE TO COMPLY WITH
22 LAWS, CALIFORNIA REGULATIONS AS TO HOW MUCH CAN BE EMITTED
23 ANYWAY, SO WE ARE GOING TO HAVE TO BE WITHIN THOSE
24 REQUIREMENTS, SO THE LAWS ARE PROTECTIVE, AND WE'RE GOING
25 TO MAKE SURE OUR ACTIONS ARE ALSO PROTECTIVE.

1 MS. HERRERA: WILL YOU STATE YOUR NAME FOR THE RECORD?

2 MR. MORENO: RICK MORENO, M-O-R-E-N-O.

3 MS. HERRERA: THERE'S A QUESTION IN THE BACK.

4 MR. CALDERONE: MY NAME'S DENNIS CALDERONE. YOU HAVE
5 ALL THESE STUDIES. HAVE YOU EVER HAD A STUDY ON HEALTH OR
6 THE PEOPLE THAT ARE AROUND THAT AREA AS FAR AS I MEAN, YOU
7 KNOW, CERTAIN HEALTH DANGERS OR WHATEVER'S IN THAT CERTAIN
8 AREA OR DO YOU HAVE ANY?

9 MR. HARRIS-BISHOP: MARILYN, DO YOU WANT TO TAKE THAT?

10 MS. UNDERWOOD: I'M FROM THE CALIFORNIA DEPARTMENT OF
11 HEALTH SERVICES. WE HAVE ACTUALLY A COOPERATIVE AGREEMENT
12 WITH THE FEDERAL AGENCY TO LOOK AT HEALTH ISSUES AROUND
13 SUPERFUND SITES. THIS AGENCY HAD LOOKED AT THAT -- NOT
14 D.H.S., BUT THIS AGENCY LOOKED AT THE SITE IN 1988, FELT
15 THAT IT MIGHT POSE A POTENTIAL PATHWAY OF CONCERN OR HEALTH
16 CONCERN. AT THAT POINT, THERE WAS VERY LITTLE DATA. I'M
17 JUST IN THE PROCESS OF REVIEWING THE SITE RIGHT NOW, AND I
18 THINK BASED ON WHAT I SEE, I WOULD NOT SAY THAT THERE'S A
19 NEED FOR A HEALTH STUDY AROUND THIS AREA BECAUSE I DON'T
20 THINK THERE'S BEEN PATHWAYS OF EXPOSURE THAT WOULD ELICIT
21 ENOUGH -- ANY DISEASE ACTUALLY IN THIS AREA TO SEE, SO IF I
22 FELT -- AND WE DO THIS ACROSS CALIFORNIA. I HAVE REVIEWED
23 OTHER SITES WHERE I THINK IT'S SOMETHING THAT'S WARRANTED,
24 TO DO A HEALTH STUDY.

25 MR. CALDERONE: THEY WERE TALKING ABOUT THE AREA AND

1 EVERYTHING ELSE, BUT I DON'T KNOW IF THEY MENTIONED
2 PEOPLE'S HEALTH.

3 MR. HARRIS-BISHOP: WHAT I WANT TO STRESS IS WE DON'T
4 CURRENTLY HAVE THAT EXPOSURE, AND WE WANT TO MAKE SURE WE
5 DON'T HAVE THAT EXPOSURE IN THE FUTURE.

6 YES, SIR.

7 FATHER GALLAGHER: AND MY POINT WOULD BE THE POINT
8 THAT I HAVE MADE BEFORE IS THAT I THINK THAT THERE SHOULD
9 BE A CLARIFICATION ABOUT THE WORD CONTAMINATION BECAUSE
10 THERE IS -- CONCERN OBVIOUSLY HAS BEEN EXPRESSED BY SOME
11 PEOPLE AND COMMENTS THAT HAVE BEEN MADE IN TERMS OF, YOU
12 KNOW, LIKE IS THERE A GREATER INCIDENT OF LUNG CANCER? IS
13 THERE A GREATER INCIDENT OF SOME KIND OF PROBLEM OF HEALTH
14 BASICALLY BECAUSE OF THE -- OF THE LOCATION OF THE WASTE
15 DUMP NEAR US, AND THAT IS WHERE I THINK THAT THERE IS A
16 PROBLEM BECAUSE YOU VERY QUICKLY GO TO A POINT WHERE YOU
17 SAY WELL, THERE'S METHANE GAS BEING USED TO OPERATE THE
18 SHERATON INDUSTRY HILLS, AND PEOPLE ARE OUT THERE PLAYING
19 GOLF EVERY DAY, AND ALL OF US WHO LIVE IN WHITTIER ARE
20 RECEIVING ALL OF THE EMISSIONS THAT ARE COMING FROM A
21 NUMBER OF THE PLANTS IN SANTA FE SPRINGS ALL THE TIME, SO I
22 THINK THAT WHAT WE'RE TRYING TO DO IS TRYING TO FIND OUT
23 WELL, IS THERE A REASON FOR US TO BE CONCERNED ABOUT THE
24 HEALTH OF OUR CHILDREN, THE PEOPLE WHO LIVE ACROSS THE
25 STREET, YOU KNOW, BASED ON THIS, AND THAT IS EXACTLY WHAT

1 I'M HOPING THAT IS GOING TO BE DISCUSSED AS PART OF THE
2 PUBLIC SERVICE INVOLVED WITH THIS.

3 SO -- AND I'D LIKE TO MAKE A COMMENT NOW. YOU
4 DON'T HAVE TO ANSWER IT THOUGH BECAUSE I'D LIKE TO -- MY
5 NAME'S ROBERT GALLAGHER. I'M THE PRINCIPAL OF ST. PAUL
6 HIGH SCHOOL. I WOULD LIKE TO SAY THAT WE ARE VERY
7 APPRECIATIVE OF THE WORK OF THE E.P.A. THE SCHOOL HAS
8 COOPERATED WITH A NUMBER OF THE STUDIES THAT HAVE GONE ON
9 IN TERMS OF WHETHER OR NOT THERE IS SOME PROBLEM, AIRBORN
10 OR SOIL-BORN, IN TERMS OF THE HEALTH OF OUR STUDENTS OR
11 ANYTHING THAT WE SHOULD BE CONCERNED ABOUT. IF IN
12 CONJUNCTION WITH THE CITY OF SANTA FE SPRINGS, WHO WE
13 BELIEVE ARE RESPONSIBLE INDIVIDUALS ELECTED BY THE MEMBERS
14 OF THE CITY, THAT SOMETHING SHOULD BE DECIDED TO BE DONE ON
15 THAT PROPERTY, THAT WE WOULD PREFER THAT NOTHING WOULD BE
16 ABOVE THE LEVEL OF THE PROPERTY IN TERMS OF BUSINESS WHERE
17 WE WOULD HAVE TO BE CONCERNED ABOUT THE SAFETY OF THE
18 STUDENTS AT SOME FUTURE DATE BASED ON A DECISION OF
19 SOMEBODY OTHER THAN US ABOUT WHO IS GOING TO OWN THAT
20 PROPERTY OR USE THAT PROPERTY OR WE WOULD WANT SOMETHING,
21 FOR EXAMPLE, A WALL OR THE GOVERNMENT TO PROVIDE SOME KIND
22 OF PROTECTION SO THAT WE WOULD NOT HAVE TO BE CONCERNED
23 ABOUT THE SAFETY OF OUR STUDENTS, SO IF WE HAD A COMMENT TO
24 MAKE, I WOULD THINK THAT IT WOULD BE THAT WE WOULD PREFER
25 THAT IT NOT BE ASPHALT, THAT IT WOULD REMAIN EXACTLY THE

1 WAY IT IS, AND IF THERE IS ABSOLUTELY NO PROBLEM RIGHT NOW
2 AND IF I COULD BUILD A HOUSE THERE THAT I COULD LIVE ON FOR
3 70 YEARS WITH NO PROBLEM, WELL, THEN I WOULD JUST ASSUME
4 SEE THAT THINGS BE LEFT AS THEY ARE RIGHT AT THIS MOMENT.

5 MR. HARRIS-BISHOP: THANK YOU.

6 MR. SHARP: ALBERT SHARP. COMMENT: ALONG WITH FATHER
7 GALLAGHER, I AS A CITY COUNCILMAN IN THIS CITY HAVE NO
8 DESIRE TO SEE ANYTHING HAPPEN ON THAT SITE AS FAR AS A
9 STORAGE YARD OR ANYTHING. I THINK EVERY MEMBER OF THE
10 E.P.A. IN THIS ROOM KNOWS HOW I FEEL ABOUT PUTTING ASPHALT
11 DOWN. I DON'T WANT TO SEE A BLACK OR A GREEN MOUNTAIN. AS
12 FAR AS I'M CONCERNED, IF THERE'S NOTHING WRONG WITH THE
13 SOIL, WHY DON'T WE JUST PLANT WILD FLOWERS OVER IT, MAKE IT
14 AS AESTHETICALLY PLEASING TO THE COMMUNITY AS WE POSSIBLY
15 CAN AND LET THAT SLEEPING DOG LIE IF THERE'S NO -- ALL
16 WE'RE DOING IS JUST COVERING IT SO SOMEONE CAN COME IN AND
17 SET SOME TRACTORS AND TRUCKS AND TRAVEL TRAILERS AND
18 WHATEVER ELSE ON IT. NO, I'M NOT IN FAVOR OF THAT.

19 MR. HARRIS-BISHOP: THANK YOU.

20 MR. SHARP: BUT I DON'T KNOW HOW MUCH VOICE THE CITY
21 OF SANTA FE SPRINGS EVEN HAS.

22 MR. HARRIS-BISHOP: I WOULD LIKE TO JUST REITERATE
23 THAT IT IS IMPORTANT THAT WE HEAR THESE COMMENTS. THAT'S?
24 WHY WE LOOKED AT A LOT OF THESE DIFFERENT ALTERNATIVES, AND
25 THEY'RE ALL OPEN FOR COMMENT. I THINK THAT'S DEFINITELY A

1 LEGITIMATE CONCERN, AND IF WE CAN DETERMINE IF THAT'S
2 PROTECTIVE AND EVERYONE WANTS TO GO WITH THAT, WE CAN DO
3 THAT. I MEAN THERE'S GOING TO BE RESTRICTIONS ON THE USE
4 OF THE PROPERTY ANYWAY, SO IF WE WANT TO JUST RESTRICT AND
5 MAKE IT A BEAUTIFUL GRASSY GREEN FIELD THAT EVERYONE CAN
6 DRIVE BY AND ENJOY, THAT'S A POSSIBILITY, AND THAT'S ONE OF
7 THE ALTERNATIVES THAT WE LOOKED AT. IT'S ALSO -- WE COULD
8 MIX COMPONENTS OF THE ALTERNATIVES SO THAT WE HAVE -- WE'VE
9 ALREADY GOT A PARKING LOT OVER PART OF THE AREA WHERE SANTA
10 FE SPRINGS STORAGE IS. WE CAN WORK AROUND THAT. THERE'S A
11 LOT OF DIFFERENT ALTERNATIVES WE HAVE. I MEAN I REALLY DO
12 APPRECIATE THESE COMMENTS BECAUSE IT WILL HELP ME GO BACK,
13 AND WHEN WE'RE WRITING THE DECISION, IF WE COME UP WITH
14 SOMETHING DIFFERENT, YOU'LL KNOW BECAUSE WHEN WE COME OUT
15 AND TELL YOU WHAT OUR DECISION IS, IT'S GOING TO -- IT
16 WON'T BE A PROPOSED PLAN IF EVERYONE FEELS THAT WE NEED TO
17 DO SOMETHING DIFFERENT.

18 MS. HERRERA: THERE'S SOMEONE ELSE IN THE BACK.

19 MS. CALDERONE: MY NAME IS DEBORAH CALDERONE,
20 C-A-L-D-E-R-O-N-E, AND MY COMMENT AND CONCERN BASICALLY
21 GOES BACK TO SEISMIC ACTIVITY. I HAVE CHILDREN THAT GO TO
22 ST. PAUL. IF WE HAVE A MAJOR CATASTROPHE -- IT COULD BE
23 TODAY, TOMORROW, TEN YEARS FROM NOW -- MY KIDS HAVE TO GO
24 OUT THERE ON THAT FIELD. IS THERE ANY WARNING SIGNS, BELLS
25 OR SOMETHING TO SAY THAT, YOU KNOW, THERE IS TOXIC WASTE

1 GOING OUT IN THE AIR, METHANE GAS? ARE THEY GOING TO BE
2 EXPOSED AND HARMED BY THIS IF THEY'RE OUT THERE IN THE
3 FIELD? I MEAN WHAT IS THE LIMITS TO WHERE THEY WOULD BE
4 EXPOSED?

5 MR. HARRIS-BISHOP: I DON'T KNOW IF I CAN ANSWER YOUR
6 QUESTION RIGHT NOW. I DON'T ENVISION THAT IF WE HAD AN
7 EARTHQUAKE -- I MEAN THERE WAS A SIGNIFICANT EARTHQUAKE
8 HERE, I THINK, IN THE LATE '80'S THAT WE DIDN'T SEE ANY --
9 YOU KNOW, DISTINCTIVE SHIFT IN ANY STRUCTURE AT THE SITE.
10 WHAT WE WOULD BE DOING THOUGH IS TO MAKE SURE THAT THAT'S
11 PROTECTIVE. IF THERE WERE, YOU KNOW, SOME KIND OF RELEASE,
12 THEN WE WOULD HAVE TO ADDRESS IT AT THAT TIME. I CAN'T SAY
13 RIGHT NOW THAT IF THERE IS SOME EARTHQUAKE, THAT NOTHING IS
14 GOING TO HAPPEN BECAUSE I CAN ENVISION A PRETTY BIG
15 EARTHQUAKE.

16 MS. CALDERONE: COMMENTS WERE MADE BY THE STUDENTS
17 THAT THEY SAW FOG OR STEAM COME FROM THIS AREA AFTER ONE OF
18 THE LAST EARTHQUAKES. THAT WAS MY CONCERN IS HOW MUCH WAS
19 TRUTH TO IT OR NOT? I DON'T KNOW.

20 MR. HARRIS-BISHOP: I'M NOT AWARE OF THAT AT ALL. I
21 DON'T THINK THAT YOU WOULD BE ABLE TO SEE METHANE IF IT
22 WERE RISING. IT'S A --

23 FATHER GALLAGHER: THAT'S A CLARIFICATION ON THAT.
24 THERE WAS NOTHING THAT CAME FROM THAT PIECE OF PROPERTY AT
25 ALL; THAT THERE WAS A GAS BUBBLE OR A GAS CLOUD THAT CAME

1 OVER THE AREA THAT CAME FROM A DIFFERENT INDUSTRIAL SITE IN
2 THE CITY OF SANTA FE SPRINGS, BUT IT HAD NOTHING TO DO WITH
3 THAT PIECE OF PROPERTY RIGHT NEXT TO IT, AND I THINK
4 MR. SHARP WOULD AGREE WITH THAT.

5 MR. HARRIS-BISHOP: WHAT WE'VE DETECTED THUS FAR HAS
6 JUST BEEN FAIRLY SMALL, AND I CAN'T ENVISION SOMETHING
7 COMING UP THAT WE COULD SEE, BUT WE'LL KEEP MONITORING
8 THAT, AND ANY OF THESE ALTERNATIVES, WE'LL CONTINUE TO
9 MONITOR THE GAS AND THE GROUNDWATER TO MAKE SURE THAT WE
10 ARE MAINTAINING PROTECTIVENESS.

11 YES, SIR, MR. CALDERONE.

12 MR. CALDERONE: MY NAME IS DENNIS CALDERONE. YOU'RE
13 TALKING ABOUT PUTTING THE DAISIES AND EVERYTHING. IS THERE
14 ANY WAY THAT YOU CAN PUT A NICER LOOKING FENCE INSTEAD OF
15 BARBED WIRE OR A HIGHER FENCE?

16 MR. HARRIS-BISHOP: I THINK THAT'S A LEGITIMATE
17 COMMENT. THAT'S SOMETHING WE'LL LOOK INTO.

18 MR. MORENO: RICK MORENO. TO BE A SUPERFUND SITE,
19 DOES THAT MEAN THAT THIS SOIL IS EXTREMELY CONTAMINATED OR
20 IS IT JUST -- YOU KNOW, IT JUST DOESN'T GET ON THE
21 SUPERFUND SITE JUST FOR NOTHING, RIGHT?

22 MR. HARRIS-BISHOP: WHAT WE DO WHEN WE'RE DOING THIS
23 PRELIMINARY INVESTIGATION, BEFORE IT'S LISTED ON THE
24 NATIONAL PRIORITIES LIST, WE MAKE A LOT OF ASSUMPTIONS. WE
25 TAKE A LIMITED NUMBER OF SAMPLES AND THEN PUT IT INTO A

1 MODEL TO SEE IF IT COULD POTENTIALLY CAUSE A PROBLEM. A
2 PROBLEM WITH ANY MODEL IS THAT YOU MAKE ASSUMPTIONS, AND,
3 YOU KNOW, THE NUMBERS CAME OUT, AND WE SAID THIS IS
4 POTENTIALLY ENOUGH FOR --

5 MR. MORENO: SO IT IS VERY CONTAMINATED PROBABLY.

6 MR. HARRIS-BISHOP: I WOULDN'T SAY IT'S VERY
7 CONTAMINATED. IT'S JUST THAT OUR ASSUMPTIONS WERE --

8 MR. MORENO: MORE THAN JUST A LITTLE BIT.

9 MR. HARRIS-BISHOP: OUR ASSUMPTIONS LED US TO BELIEVE
10 THAT IT WOULD BE MORE CONTAMINATED THAN WE ULTIMATELY IN
11 DOING OUR THOROUGH INVESTIGATION THAT WE DID FOUND IT TO
12 BE. WHAT WE FOUND IS THAT -- I MEAN THERE ARE CONTAMINANTS
13 HERE THAT ARE OF CONCERN. THEY'RE MOSTLY DEEP. THEY'RE
14 NOT READILY ACCESSIBLE TO THE PUBLIC, BUT AS I SAID, IN THE
15 FUTURE THEY COULD BE BY SOMEONE GOING OUT THERE.

16 MR. MORENO: IF THERE'S AN EARTHQUAKE OR WHATEVER.

17 MR. HARRIS-BISHOP: I DON'T THINK IF THERE'S AN
18 EARTHQUAKE, YOU'D SEE AN EXPLOSION DOWN AT 35 FEET.

19 MR. MORENO: BECAUSE THE KIDS DID SEE THAT CLOUD COME
20 FROM THAT SOIL.

21 MR. HARRIS-BISHOP: AS FATHER GALLAGHER SAID, THAT WAS
22 FROM ANOTHER FACILITY.

23 MR. MORENO: NO, THAT WAS THAT SITE, 43 ACRE SITE WE
24 ARE TALKING ABOUT.

25 MR. HARRIS-BISHOP: ACTUALLY, I CAN'T SPEAK TO THAT AT

1 ALL BECAUSE I CAN'T ENVISION ANYTHING -- SOMETHING THAT YOU
2 COULD SEE COMING FROM THE SITE. IT'S JUST NOT -- THE
3 CONTAMINATION IS JUST NOT --

4 MR. MORENO: AND THERE HAVE BEEN REPORTS OF ODORS. I
5 DON'T KNOW HOW MANY PEOPLE HAVE GOTTEN SICK. THERE'S
6 BEEN -- THERE HAVE BEEN THOSE REPORTS.

7 MR. HARRIS-BISHOP: WELL, IT'S A DEFINITE COMMENT.

8 MR. MORENO: DEPENDING ON THE DIRECTION OF THE WIND.

9 MR. HARRIS-BISHOP: I'LL TAKE A LOOK AND SEE IF I CAN
10 FIND OUT ANYTHING. FROM MY PERSONAL OPINION AND WHEN I
11 HAVE EVALUATED, I CAN'T SEE --

12 MR. MORENO: THE REASON -- I'M A ST. PAUL PARENT AS
13 WELL. I'VE HAD TWO KIDS GRADUATE FROM THERE, AND I HAVE
14 ONE THAT'S CURRENTLY ATTENDING, AND WE HAVE TWO MORE COMING
15 UP, SO WE'RE GOING TO BE ASSOCIATED WITH ST. PAUL FOR MANY,
16 MANY YEARS, AND --

17 MR. HARRIS-BISHOP: I DEFINITELY UNDERSTAND YOUR
18 CONCERN. THAT'S WHY I AM HERE.

19 MR. MORENO: WE'RE CONCERNED WITH OUR KIDS AND THEN
20 THE OFFSPRING AS WELL. WHAT WILL HAPPEN 30 YEARS DOWN THE
21 LINE, WE DON'T KNOW.

22 MR. HARRIS-BISHOP: I UNDERSTAND. THAT'S WHY WE'RE
23 HERE. THAT'S WHY I FEEL CONFIDENT IN SAYING THAT --

24 MR. MORENO: WE'RE ASKING YOU BECAUSE YOU HAVE OTHER
25 EXPERIENCES. DO YOU HAVE OTHER SIMILAR SITES?

1 MR. HARRIS-BISHOP: I ACTUALLY DON'T HAVE ANY SITES
2 THAT ARE LIKE W.D.I., BUT BASED ON THE EVIDENCE FROM WHAT
3 WE'VE SEEN AT W.D.I., THE RISKS JUST ARE VERY, VERY
4 SMALL --

5 MR. MORENO: BECAUSE WE'RE VERY CONCERNED BECAUSE YOU
6 HEAR OF WHAT GOES ON IN TEXAS AND MEXICO AND OTHER AREAS
7 AND EVEN IN CALIFORNIA, AND IT'S -- IT'S VERY -- YOU KNOW,
8 YOU HAVE NIGHTMARES OVER THIS, AT LEAST I DO.

9 MR. HARRIS-BISHOP: THAT'S WHY WE'RE HERE TO TAKE
10 YOUR -- LISTEN TO YOUR CONCERNS AND ADDRESS THEM, AND I'LL
11 BE THE FIRST ONE TO SAY I THINK THAT THE SITE'S RISKS --
12 RISKS POSED BY THE SITE ARE --

13 MR. MORENO: JUST THAT ONE RISK THAT YOU'RE TALKING
14 ABOUT. IF IT'S JUST A MINIMUM RISK, THE RISK EXISTS.

15 MR. HARRIS-BISHOP: YES, SIR, I UNDERSTAND.

16 ANDY?

17 MR. LAZZARETTO: LAZZARETTO. HAS THE E.P.A. DEVELOPED
18 A PROFILE, A TOPOGRAPHIC PROFILE, OF HOW THE SITE WOULD
19 LOOK AFTER THE IMPLEMENTATION OF THE ALTERNATIVE?

20 MR. HARRIS-BISHOP: NO. THAT WOULD BE DONE DURING ANY
21 DESIGN THAT WE DO ULTIMATELY FOR THE SITE. I MEAN THE ONLY
22 THING I HAVE IS KIND OF THIS REALLY ROUGH SCHEMATIC WHICH
23 MORE -- MORE OR LESS REALLY JUST SHOWS THE LAYERS THAT
24 WE'RE GOING TO HAVE --

25 MR. LAZZARETTO: THEN I WOULD MAKE THE COMMENT THAT

1 SOME WORK BEFOREHAND SHOULD BE DONE TO MAKE REPRESENTATION
2 OF HOW -- HOW THE SITE WILL LOOK GIVEN THE FACT THAT MORE
3 EARTH IS GOING TO BE PLACED ON TOP SO THAT THERE'S SOME
4 GOOD IDEA SO PEOPLE CAN MAKE, I THINK, AN INFORMED DECISION
5 OF HOW IT'S GOING TO LOOK ULTIMATELY.

6 MR. HARRIS-BISHOP: ABOUT HOW HIGH OR SOMETHING --

7 MR. LAZZARETTO: I'D LIKE TO ASK ONE MORE QUESTION
8 WHILE I HAVE THE FLOOR. IN THE AREAS ALONG GREENLEAF THAT
9 ARE SHOWN IN PINK, THE HATCHED PINK, WHAT IS THE NATURE OF
10 THE CONTAMINATION ALONG THOSE PROPERTIES, DO YOU KNOW
11 OFFHAND?

12 MR. HARRIS-BISHOP: OFFHAND, I KNOW THAT WE HAVE
13 ELEVATED LEVELS OF ARSENIC AND THALLIUM, AND WE ALSO
14 DETECTED IN HERE (INDICATING) SOME ELEVATED LEVELS OF
15 CHROMIUM NEAR THE SURFACE, AND I BELIEVE BENZOPYRENE IS
16 ANOTHER ONE, WHICH IS A PETROLEUM DERIVATIVE THAT I THINK
17 IS A POTENTIAL HUMAN CARCINOGEN. ALL OF THESE WERE FOUND
18 AT RELATIVELY LOW LEVELS, BUT SINCE WE'RE GOING TO BE --
19 SINCE WE CAN GET TO IT, THAT'S WHY WE WANT TO GET TO IT IF
20 WE CAN, BUT IN THE FEASIBILITY STUDY IT LAYS OUT THE
21 CONTAMINATION THAT WE FOUND AT EACH OF THOSE AREAS. WE
22 DIVIDED THE SITE INTO EIGHT SUBAREAS AND LOOKED AT THEM AND
23 KIND OF CATEGORIZED WHAT CONTAMINATION WE FOUND BASED ON
24 HISTORICAL RECORDS OF THE SITE.

25 MR. LAZZARETTO: IF I COULD HAVE A FOLLOW-UP QUESTION

1 OF THAT, RUSTY. ON THOSE PROPERTIES THAT ARE ON THE
2 PERIPHERY BUT NOT MARKED IN PINK, IF I UNDERSTOOD WHAT YOU
3 WERE SAYING EARLIER, THAT THERE MIGHT BE DEED RESTRICTIONS
4 PLACED ON SOME OF THOSE PROPERTIES. HAVE YOU IDENTIFIED
5 WHICH PROPERTIES MIGHT HAVE DEED RESTRICTIONS, FOR EXAMPLE,
6 OR WHAT OTHER KIND OF LAND USE CONTROLS AND HAVE YOU
7 IDENTIFIED WHAT KIND OF LAND USE CONTROLS THAT WOULD GO
8 WITH EACH OF THE PROPERTIES?

9 MR. HARRIS-BISHOP: NO, WE HAVEN'T. THAT'S SOMETHING
10 THAT WOULD BE PART OF THE DESIGN PHASE IN DESIGNING THE
11 INSTITUTIONAL CONTROLS FOR PROTECTIVENESS BUT STILL
12 ALLOWING SOME FLEXIBILITY. I CAN SAY MOST OF THE PARCELS
13 DO HAVE SOME LEVEL OF CONTAMINATION. SOME OF IT MAY BE
14 DOWN ONLY AT 20 FEET SO THAT WE CAN PRETTY MUCH -- I THINK
15 WE COULD SAY WE'D ALLOW ALMOST UNLIMITED DEVELOPMENT AS
16 LONG AS YOU DON'T DIG DOWN PAST 20 FEET, SO -- BUT WE WOULD
17 BE DOING THAT ON A PARCEL BY PARCEL BASIS DURING THE DESIGN
18 TO HAVE A MORE ACCURATE DEPICTION OF THE CONTAMINATION OF
19 EACH PARCEL.

20 WHAT WE DID DURING THE REMEDIAL INVESTIGATION IS
21 LOOKED AT IT ON A SITE-WIDE BASIS, BUT THAT IS SOMETHING
22 THAT WE WOULD HAVE TO ADDRESS DURING THE DESIGN.

23 MR. LAZZARETTO: THANK YOU.

24 MS. HERRERA: WE HAVE A QUESTION IN THE BACK.

25 SHE CHANGED HER MIND. DO YOU STILL WANT TO MAKE

1 A COMMENT?

2 MR. HARRIS-BISHOP: IN THE BACK?

3 MS. CAMERENE: HOW MANY PEOPLE IN THE MEDIA KNOW ABOUT
4 THIS MEETING? DID YOU PUBLISH IT IN THE NEWSPAPER?

5 MR. HARRIS-BISHOP: WE HAVE A MAILING LIST OF OVER
6 100, I THINK, RIGHT NOW THAT WE MAILED A FACT SHEET OUT
7 TO. WE TOOK OUT ADVERTISEMENTS IN THE NEWSPAPER, AND WE
8 HAVE TWO REPORTERS RIGHT HERE, MICHAEL SPRAGUE FROM THE
9 WHITTIER DAILY NEWS AND PSYCHE PASCUAL FROM THE LOS ANGELES
10 TIMES, AND THEY BOTH WROTE ARTICLES CONCERNING THIS PUBLIC
11 MEETING AND ARTICLES PREVIOUSLY -- I KNOW MIKE HAS WRITTEN
12 SEVERAL ARTICLES ABOUT THE SITE.

13 MS. CAMERENE: AND THE SECOND THING IS IGNORANCE IS
14 THE BIGGEST ENEMY OF EVERYBODY, AND THIS COMES AS A
15 SURPRISE WHAT IS GOING ON AND HOW TO PUT THE REMEDY, AND
16 IT'S LIKE -- I MEAN THERE'S TOO MANY THINGS IN THE AIR.
17 WHAT IS THE DECISION? IT'S KIND OF CONFUSING. LIKE FATHER
18 GALLAGHER SAYS, LEAVE IT LIKE IT IS OR GET INTO, YOU KNOW,
19 THAT WILL TAKE A YEAR, TWO YEARS, THE EXPOSURE? I DON'T
20 KNOW.

21 MR. HARRIS-BISHOP: LIKE I SAID, I WANT TO EXPRESS
22 JUST ONE MORE TIME E.P.A. IS GOING TO MAKE SURE THAT
23 WHATEVER WE DO IS PROTECTIVE FIRST OFF. THAT'S OUR GOAL,
24 AND SO ANYTHING THAT WE DO IS GOING TO BE PROTECTIVE. IF
25 WE CAN MAKE CONCESSIONS TO THE PUBLIC TO DO SOMETHING THAT

1 THEY WOULD LIKE BETTER AND IT'S STILL PROTECTIVE, WE WILL
2 DO THAT, AND IF THE CITY COUNSEL HAS PROVISIONS THAT THEY
3 WOULD LIKE INCLUDED AND THEY'RE STILL PROTECTIVE, WE WILL
4 DO THAT. WE CAN'T GO OUT AND SPEND 100 MILLION DOLLARS TO
5 PAINT THAT PAVEMENT BRIGHT BLUE SO EVERYONE LIKES IT OR
6 BUILD A SOCCER FIELD OR SOMETHING LIKE THAT, BUT WE CAN BE
7 WITHIN REASON TO TAKE INTO ACCOUNT YOUR CONCERNS SO THAT WE
8 ADDRESS THEM APPROPRIATELY.

9 FATHER GALLAGHER?

10 FATHER GALLAGHER: THIS IS A COMMENT, AN ADDITIONAL
11 COMMENT; THAT I THINK THAT SOME PEOPLE HAVE INDICATED HERE
12 THIS EVENING THAT THEY'RE A LITTLE BIT CONFUSED. IF YOU
13 WILL NOT TAKE AWAY EVERYTHING THAT IS ON THE PROPERTY RIGHT
14 NOW, WHY WOULD YOU EVER ACCEPT THAT WE WOULD WANT YOU TO
15 DIG IN SOME OF THE AREA THAT YOU CONSIDER CONTAMINATED AND
16 PUT THAT CONTAMINATED SOIL ON TOP OF FIVE FEET OF SOIL THAT
17 IS NOT CONTAMINATED AND THEN GUARANTEE US THAT THAT IS
18 GOING TO BE PROTECTED BY WHATEVER YOU DO WITH IT WHEN
19 YOU'RE USING THE ARGUMENT THAT IT WOULD BE SAFER FOR US TO
20 NOT -- NOT TO TOUCH -- NOT TO MOVE IT FROM THAT AREA AT
21 ALL? SO THAT'S WHY I THINK THAT THERE HAS TO BE A
22 CLARIFICATION ABOUT THE WORD CONTAMINATION BECAUSE I HAVE
23 BEEN LED TO BELIEVE THAT WE'RE USING THE WORD
24 CONTAMINATION, AND THERE IS PROBABLY A POSSIBILITY OF
25 CONTAMINATION ON THAT PIECE OF PROPERTY THAT MIGHT NOT BE

1 ANY DIFFERENT THAN THE BACK YARD OF SOMEBODY IN SANTA FE
2 SPRINGS IN SOME AREAS OF CONTAMINATION.

3 MR. HARRIS-BISHOP: WELL, WHAT WE'RE GOING TO BE --
4 THE MATERIAL THAT WE'D BE EXCAVATING IS AT AN ELEVATED
5 LEVEL. IT'S NOT SOMETHING THAT IS GOING TO POSE A THREAT
6 ONCE IT'S UNDER THAT CAP. WE WOULDN'T EXCAVATE THIS
7 MATERIAL AND PUT IT IN THE MIDDLE AND THEN JUST LEAVE IT
8 THERE. THAT'S WHY WE WANT TO PUT THE CAP DOWN, TO PREVENT
9 ANYONE FROM COMING INTO CONTACT. THAT WOULD BE -- THAT
10 WOULD PREVENT ANY EXPOSURE. THE OTHER ALTERNATIVE THAT WE
11 HAVE WHERE WE EXCAVATE AND THEN CONSOLIDATE THE MATERIAL
12 WITH THE CAP, THAT'S THE GOAL OF THE CAP IS TO PREVENT ANY
13 FUTURE CONTAMINATION. IT'S A PHYSICAL BARRIER TO THE
14 CONTAMINATION. IF WE DON'T DO ANYTHING ABOUT IT, THEN WE
15 RISK SOMEONE COMING ALONG AND EVENTUALLY COMING INTO
16 CONTACT WITH IT AND NOT TAKING THE PRECAUTIONS THAT E.P.A.
17 WILL TAKE WHEN WE DO THE EXCAVATION, SO I MEAN THERE IS --
18 LIKE I SAID, THERE'S ARSENIC THAT IS THERE THAT'S AT
19 ELEVATED LEVELS. WE HAVE A BACKGROUND LEVEL OF ARSENIC IN
20 THE CITY, IN CALIFORNIA, BUT WE'RE TALKING ABOUT ELEVATED
21 LEVELS FROM THAT THAT WE'VE FOUND HERE.

22 MARILYN, YOU WANT TO ANSWER THAT?

23 MS. UNDERWOOD: I JUST WANT TO MAKE A STATEMENT. THE
24 STUFF THAT'S IN THE GROUND IS NOT JUST LIKE YOUR BACK YARD
25 SOIL. E.P.A. DOESN'T GO AROUND CLEANING UP SITES AND

1 WORRYING ABOUT SITES THAT ARE BACK YARD SOIL, SO IF HE
2 IMPLIED THAT THAT'S TRUE, THAT'S NOT TRUE. THERE'S MORE
3 THAN JUST ARSENIC THERE. THERE'S A NUMBER OF COMPOUNDS
4 THAT EXCEED HEALTH CRITERIA ACCORDING TO THE DEVELOPMENT BY
5 BOTH THE STATE AND FEDERAL AGENCIES ABOUT WHAT IS
6 ACCEPTABLE LEVELS IN SOIL, AND THAT SOMEWHAT IS BASED ON
7 THE FACT THAT OBVIOUSLY IF THIS STUFF WAS ALL AT THE
8 SURFACE, IT WOULD BE MUCH MORE OF A CONCERN TO EVERYBODY
9 HERE, BUT BECAUSE IT'S BURIED, IT'S NOT OBVIOUSLY POSING AN
10 IMMEDIATE CONCERN. THE CONCERN ALSO THEN IS WHILE ALL OF
11 THIS CAN GO DOWN INTO THE GROUNDWATER, MANY OF THESE
12 COMPOUNDS ARE FAIRLY MOBILE. THEY CAN MOVE DOWN INTO THE
13 GROUNDWATER, AND YOU DO GET -- EVENTUALLY IF YOU DON'T
14 WATCH OUT, IT WILL BE ALL THE WAY DOWN IN THE DRINKING
15 WATER SOURCE FOR PEOPLE IN THIS AREA, SO YOU WANT TO STOP
16 THE INFILTRATION INTO THE GROUNDWATER.

17 THE LAST WAY YOU CAN GET EXPOSED IS THROUGH THE
18 AIR THROUGH THE GASES ESCAPING, AND, AGAIN, YOU WANT TO TRY
19 TO MINIMIZE THAT, AND THEY'RE GOING TO TRY TO MINIMIZE THAT
20 BY PULLING THE GASES OUT IF THERE IS ANY SUBSTANTIAL
21 ACCUMULATION OF THOSE, SO -- BUT TO IMPLY THAT THIS IS A,
22 YOU KNOW -- THIS IS AN INNOCUOUS SITE, YOU DON'T HAVE TO
23 WORRY ABOUT CHEMICALS HERE IS WRONG. IT'S NOT, BUT IT
24 HAPPENS TO BE BURIED. NOW YOU'RE GOING TO TAKE STEPS TO
25 KEEP IT FROM EVER BEING EXPOSED TO PEOPLE, OKAY?

1 FATHER GALLAGHER: YOU KNOW, LIKE LET'S TAKE THE
2 SCENARIO IT'S BURIED NOW AND THERE'S AN EARTHQUAKE, A
3 SIZEABLE EARTHQUAKE. UNDER THE GROUND RIGHT NOW YOU MIGHT
4 HAVE SOME KIND OF A FISSURE THAT WOULD COME ABOUT AND THAT
5 A CERTAIN AMOUNT OF GROUND UNDERNEATH THE GROUND LEVELS
6 WOULD BE BROKEN UP INTO SOME KIND OF A CAVERN OR SOMETHING
7 ELSE LIKE THAT, BUT THEN YOU'RE SAYING TO ALL THESE PEOPLE
8 WELL, YOU'RE GOING TO PROVIDE THIS PLASTIC SHEET ON TOP OF
9 WHAT IS GOING TO BE ON TOP OF THE GROUND WHERE THE SHAKING
10 MIGHT GO ON AND RIP THAT PLASTIC SHEET, AND THEN WE'RE
11 GOING TO HAVE CONTAMINATED SOIL RIGHT UP THERE NEAR THE TOP
12 OF THE --

13 MS. UNDERWOOD: RIGHT. I DEFINITELY AS A TOXICOLOGIST
14 WOULD BE CONCERNED ABOUT MAKING IT SAFE FOR SEISMIC
15 ACTIVITY, SO I THINK YOU HAVE A VERY GOOD POINT.

16 MR. HARRIS-BISHOP: LET ME JUST REITERATE THAT WE'RE
17 NOT JUST GOING TO PAVE THE SITE AND LEAVE. WE'LL BE BACK
18 HERE SAMPLING EVERY YEAR. WE'LL BE LOOKING AT THE
19 INTEGRITY OF THE CAP. I MEAN IF WHITTIER GETS AN
20 EARTHQUAKE, THAT WOULD BE SOMETHING THAT WE'D HAVE TO SAY
21 LET'S GO TAKE A LOOK AT THAT. THE LONG-TERM OPERATION OF
22 MAINTENANCE IS SOMETHING THAT WILL BE CONTINUAL AS LONG AS
23 THIS REMEDY IS IN PLACE, AND WE'LL BE LOOKING AT IT TO MAKE
24 SURE THAT WHATEVER WE DO, YOU KNOW, THE GROUNDWATER IS
25 PROTECTED, THE AIR IS NOT BEING IMPACTED AND THE

1 CONTAMINATION IS NOT MOVING. THAT'S -- SO EVERY YEAR WE'LL
2 BE -- WE'LL BE DOING SAMPLING, EVERY FIVE YEARS WE'LL BE
3 EVALUATING TO MAKE SURE WE'LL STILL BE PROTECTIVE. THAT'S
4 OUR GOAL.

5 BROTHER DENNIS?

6 BROTHER DENNIS: I'VE LIVED IN SANTA FE SPRINGS LIKE
7 FROM 1965 ON, AND I'M AWARE THAT MOST OF THE TIME -- NOT
8 ALL THE TIME -- BUT I'M QUITE AWARE THE CITY HAS SPENT
9 LARGE AMOUNTS OF MONEY ON THE AESTHETICS OF THE CITY AND
10 PUTTING IN SOMETHING -- HOW MANY ACRES OF ASPHALT?

11 MR. HARRIS-BISHOP: THIS IS ABOUT 18 -- THE WHOLE
12 SITE'S 43, AND I THINK THIS IS ACTUALLY --

13 BROTHER DENNIS: MY CONCERN IS THAT'S A FAIRLY UGLY
14 LOOKING THING, AND I OBVIOUSLY WOULD BE MORE -- THE GREEN
15 FIELD IS OBVIOUSLY MORE PLEASING TO LOOK AT.

16 MS. AGUILAR: SPECIFICALLY, CLEANING IT UP, HOW LONG
17 WOULD IT TAKE?

18 MR. HARRIS-BISHOP: TO -- TO DO ALL THE EXCAVATION? I
19 DIDN'T ACTUALLY GO -- CALCULATE IT AS FAR AS CLEANING IT
20 UP. I COULD TELL YOU THAT WE'D BE TALKING ABOUT ALMOST
21 750,000 CUBIC YARDS.

22 MS. AGUILAR: AND WHAT DO YOU DO WITH IT WHEN YOU TAKE
23 IT OUT?

24 MR. HARRIS-BISHOP: WE'D PUT IT IN THE GROUND
25 SOMEWHERE ELSE. WE WOULD BASICALLY TAKE IT TO A LAND --

1 MR. MORENO: YOU'RE NOT GOING TO DO THAT.

2 MR. HARRIS-BISHOP: NO. THAT WAS SOMETHING THAT WE
3 LOOKED AT AND THEN REJECTED BECAUSE OF THE INCREASED RISKS
4 INVOLVED WITH IT AND THE COSTS.

5 MS. AGUILAR: WHAT DO YOU DO WHEN YOU CLEAN IT UP?
6 WHAT DO YOU DO WHEN YOU CLEAN SOMETHING UP?

7 MR. HARRIS-BISHOP: WHEN WE CLEAN IT UP.

8 MS. AGUILAR: RIGHT. REMOVE THE SOIL, THE ENTIRE
9 THING OR --

10 MR. HARRIS-BISHOP: THAT'S WHAT WE WOULD NEED TO DO
11 HERE BECAUSE WE DON'T HAVE THE TECHNOLOGY IN PLACE THAT
12 COULD CLEAN IT WHILE IT'S DOWN THERE. YOU KNOW, MAYBE IN
13 100 YEARS WE WOULD HAVE SOMETHING THAT COULD DO THAT.

14 MR. MORENO: HOW ABOUT THAT BIO REMEDIATION THAT
15 MR. SHARP TALKED ABOUT?

16 MR. HARRIS-BISHOP: BIO REMEDIATION DOESN'T ADDRESS --

17 MR. MORENO: OR SOIL FARMING. THERE'S A LOT OF
18 OTHER --

19 MR. HARRIS-BISHOP: ANYTHING THAT RELIES ON SOME KIND
20 OF BIOLOGICAL ELEMENT, IT WORKS BY HAVING SOMETHING TO FEED
21 ON. THEY'RE NOT GOING TO FEED ON ARSENIC, AND SO
22 BIOLOGICAL ORGANISMS AREN'T GOING TO WORK TO ADDRESS THE
23 CONTAMINATION OF THE SITE. SINCE WE HAVE MULTIPLE
24 CONTAMINATION, THAT'S WHERE WE RAN INTO THE PROBLEM WHERE
25 WE DON'T HAVE ONE EASY THING THAT WE CAN TAKE CARE OF. I

1 WOULD LOVE TO HAVE SOMETHING THAT WE COULD INJECT INTO THE
2 GROUND AND MAKE THE SITE SAFE, BUT WE DON'T HAVE THAT
3 OPTION RIGHT NOW.

4 MS. AGUILAR: WHAT WOULD BE ENTAILED TO CLEAN IT?
5 YOU'D TAKE THE SOIL --

6 MR. HARRIS-BISHOP: WE DIG UP EVERYTHING THAT'S IN THE
7 RESERVOIR, EVERYTHING AROUND THE RESERVOIR THAT'S
8 CONTAMINATED, THE WHOLE SITE. EVERYTHING UNDER THOSE
9 PROPERTIES THAT ALREADY HAVE BUILDINGS AND PARKING LOTS
10 HAVE SOIL THAT WE CONSIDER TO BE CONTAMINATED AS WELL.
11 WE'D HAVE TO REMOVE ALL THAT AND THEN PUT IT INTO TRUCKS
12 AND HAUL IT TO A FACILITY THAT IS PERMITTED TO TAKE ON THAT
13 RISK. WE'D HAVE TO BASICALLY JUST PUT IT INTO A TRUCK,
14 TAKE IT TO A FACILITY WHERE THEY WOULD PUT IT INTO THE
15 GROUND AND ULTIMATELY PUT AN ASPHALT TOP ON IT.

16 MS. AGUILAR: WHERE WOULD THIS BE?

17 MR. HARRIS-BISHOP: IT'S IN KETTLEMAN CITY IS ACTUALLY
18 THE HAZARDOUS WASTE FACILITY.

19 MS. AGUILAR: WHERE?

20 MR. HARRIS-BISHOP: KETTLEMAN CITY. IT'S IN EASTERN
21 CALIFORNIA.

22 MR. LAZZARETTO: KERN COUNTY.

23 MS. AGUILAR: WHAT WOULD THEY DO, TRUCKLOADS FULL?

24 MR. HARRIS-BISHOP: WE'RE TALKING ABOUT -- A TRUCK
25 HOLDS, I THINK, 15 CUBIC YARDS, A REGULAR DUMP TRUCK, SO

1 WE'RE TALKING ABOUT SEVERAL THOUSANDS OF THOSE TRUCKS
2 RUNNING THROUGH TO HAUL THIS AWAY. IT WOULD TAKE A VERY
3 LONG TIME.

4 MS. AGUILAR: AND THEN YOU WOULD REFILL IT?

5 MR. HARRIS-BISHOP WE WOULD HAVE TO BRING IN A WHOLE
6 LOT OF CLEAN DIRT. THAT'S A LOT OF DIRT THAT WE'D HAVE TO
7 FIND, MAKE SURE THAT THAT'S CLEAN AND THEN PUT IT THERE TO
8 CLEAN UP THE SITE, AND IT'S JUST -- IT WOULD BE A HUGE
9 PROJECT FOR NOT REALLY MINIMIZING THE RISK THAT MUCH. IF
10 THERE WAS SOMETHING THERE THAT WAS CAUSING AN IMMEDIATE
11 HEALTH THREAT AND WE DIDN'T HAVE ANY OTHER CHOICES, THAT'S
12 WHAT WE'D DO.

13 MS. AGUILAR: HAVE YOU DONE IT IN OTHER SITES HERE IN
14 SANTA FE SPRINGS?

15 MR. HARRIS-BISHOP: I DON'T THINK SO. I THINK THIS
16 IS THE ONLY FEDERAL SUPERFUND SITE THAT WE HAVE IN SANTA FE
17 SPRINGS.

18 MS. AGUILAR: THEN THIS IS FUNDED BY THE FEDERAL
19 GOVERNMENT.

20 MR. HARRIS-BISHOP: SO FAR IT HAS BEEN. WHAT WE
21 ULTIMATELY -- OUR GOAL IS TO HAVE THE PEOPLE WHO ARE
22 RESPONSIBLE FOR THE CONTAMINATION, MAINLY THE GENERATORS
23 WHO GENERATED THE WASTE AND PUT IT THERE -- WE'D LIKE TO
24 HAVE THEM PAY FOR IT, AND THAT'S THE GOAL OF THE AGENCY IN
25 THE LONG TERM. IF WE END UP PAYING FOR THE WHOLE SITE UP

1 FRONT, WE'LL GO AFTER THEM ONCE WE'VE COMPLETED IT. WE'LL
2 ASK THEM TO PAY US BACK.

3 MR. MORENO: ARE THEY OIL COMPANIES?

4 MR. HARRIS-BISHOP: OIL COMPANIES ARE INVOLVED AND
5 SOME OTHER COMPANIES THAT HAD -- THAT HAD GENERATED WASTE,
6 AND THEY DISPOSED OF IT IN THERE.

7 MS. AGUILAR: SO THEN SOMEBODY WHERE YOU PUT ALL THIS
8 STUFF OVER THERE BUILDS A SCHOOL AND BUILDS A TOWN ALL
9 AROUND IT, AND IT STARTS ALL OVER AGAIN, HUH?

10 MR. HARRIS-BISHOP: THAT'S ALREADY A PERMITTED
11 FACILITY, SO THEY WOULD HAVE CONTROLS ALREADY IN PLACE, SO
12 WE WOULDN'T HAVE THIS SITUATION AGAIN.

13 MS. AGUILAR: EXCUSE ME, BUT HAVE YOU TESTED -- HAS
14 THE FIELD AT ST. PAUL'S BEEN TESTED?

15 MR. HARRIS-BISHOP: HMM-HMM. WE PUT IN, I THINK,
16 EIGHT SOIL BORINGS ON THE FOOTBALL FIELD. I THINK FATHER
17 GALLAGHER KNOWS WE KIND OF PUNCHED SOME HOLES AND WENT DOWN
18 QUITE DEEP AND FOUND THAT WE DON'T HAVE THE SAME KINDS OF
19 CONTAMINATION THAT WE HAVE ON THE SITE. WE CONSIDER THOSE
20 TO BE BACKGROUND SOIL LEVELS, AND THEY'RE, YOU KNOW, FAIRLY
21 CONSISTENT WITH WHAT WE KNOW IN THE SURROUNDING AREA, SO IT
22 DOESN'T LOOK LIKE THE ACTIVITY THAT OCCURRED AT WASTE
23 DISPOSAL EVER IMPACTED THE HIGH SCHOOL PROPERTY EVEN BEFORE
24 THE HIGH SCHOOL WAS THERE, SO -- BUT WE DID LOOK, AND WE
25 HAVE -- AND WE ARE MONITORING THE GROUNDWATER ALSO.

1 MR. MORENO: DOES IT STOP AT THE BOUNDARY, THE SOIL
2 CONTAMINATION?

3 MR. HARRIS-BISHOP: PRETTY MUCH.

4 MS. HERRERA: WE'RE DEFINITELY RUNNING OUT OF TIME.
5 WE ONLY HAVE A COUPLE OF MINUTES LEFT. I WOULD LIKE TO
6 INVITE ANYBODY WHO HAS A COMMENT TO GO AHEAD AND STATE IT.

7 FATHER GALLAGHER: ONE COMMENT, AND IT WOULD BE A
8 VERY BRIEF ONE, IS THAT I'D LIKE TO REITERATE THAT THE
9 POSITION OF THE SCHOOL IS THAT WE'D BE VERY RELUCTANT TO
10 HAVE ANY BUSINESS UP ABOVE THE LEVEL OF THE SCHOOL YARD
11 WHERE WE WOULD HAVE TO BE CONCERNED ABOUT THE SAFETY OF THE
12 STUDENTS AND ALWAYS BE WONDERING WELL, WHO WAS GOING TO BE
13 LOOKING DOWN ON THEM SINCE -- SINCE THE FIELD IS USED FOR A
14 LOT OF DIFFERENT ACTIVITIES, SO THIS IS A DIFFERENT SAFETY,
15 SO I WOULD HOPE THAT THE E.P.A. WOULD ALSO ALLOW FOR THAT
16 IF THEY'RE GOING TO BE MAKING SOME KIND OF IMPROVEMENTS IN
17 THE AREA.

18 MR. HARRIS-BISHOP: THANK YOU.

19 ARE THERE ANY OTHER COMMENTS?

20 MS. HERRERA: ANY OTHER COMMENTS?

21 MR. HARRIS-BISHOP: I'LL BE HERE -- GO AHEAD.

22 MS. HERRERA: WE WOULD LIKE TO CLOSE THE MEETING
23 BECAUSE WE HAVE TO LEAVE BY NINE O'CLOCK, BUT I WANT TO
24 THANK YOU ALL FOR ATTENDING OUR MEETING ONCE AGAIN, AND
25 ALSO I WANT TO REMIND YOU THAT WE STILL ARE DURING THE

1 PUBLIC COMMENT PERIOD, SO IF YOU DIDN'T GET A CHANCE TO
2 SUBMIT YOUR COMMENT TONIGHT OR YOU NEED SOME MORE TIME TO
3 THINK ABOUT IT, YOU CAN ALWAYS SEND YOUR COMMENTS BEFORE
4 SEPTEMBER 12, AND OUR ADDRESS IS IN THE BACK OF THE FACT
5 SHEET, AND I HOPE YOU ALL GET A CHANCE TO PICK UP ONE IF
6 YOU DID NOT RECEIVE ONE IN THE MAIL.

7 MR. SHARP: HOW WILL YOU NOTIFY THE COMMUNITY OF THE
8 E.P.A.'S DECISION?

9 MS. HERRERA: WE WILL SEND A FACT SHEET TO EVERYBODY'S
10 HOME.

11 MR. SHARP: TO ONLY THOSE PEOPLE WHO HAVE REGISTERED
12 THEIR ADDRESSES WITH E.P.A.?

13 MS. HERRERA: WELL --

14 MR. SHARP: OR WILL YOU MAKE A GENERAL MAILING OF THE
15 ENTIRE WHITTIER, SOUTH WHITTIER, SANTA FE SPRINGS AND THE
16 ADJACENT COMMUNITIES?

17 MS. HERRERA: WE HAVE A MAILING LIST OF 100 -- WE HAVE
18 100 NAMES IN THE MAILING LIST, AND ALSO OUR FACT SHEETS
19 ALSO HAVE A COUPON ON THEM THAT THEY CAN RETURN TO US, AND
20 WE KEEP UPDATING OUR MAILING LIST WITH THE NEW ADDRESSES
21 AND NEW NAMES THAT WE RECEIVE, AND IF YOU HAVE ANY
22 SUGGESTIONS FOR US OF HOW TO IMPROVE OUR MAILING, I'LL BE
23 GLAD TO TAKE THEM.

24 MR. HARRIS-BISHOP: WE ALSO DO -- I THINK WE'LL DO A
25 PRESS RELEASE AT THAT TIME ALSO TO LET EVERYONE KNOW THAT

1 WE HAVE MADE THAT DECISION AND WHAT THAT DECISION IS.

2 MS. HERRERA: AND ALSO WE PUT AN AD IN THE NEWSPAPER.

3 MR. HARRIS-BISHOP: AND THEN THE DECISION DOCUMENT
4 WILL BE AVAILABLE IN THE LIBRARY FOR ANYONE TO COME IN AND
5 LOOK AT.

6 MR. SHARP: THERE WON'T BE A FURTHER PUBLIC MEETING TO
7 IDENTIFY WHAT THAT IS TO THE PUBLIC.

8 MR. HARRIS-BISHOP: NO, NOT UNTIL WE'VE -- ONCE WE'VE
9 FINISHED THE PUBLIC COMMENT PERIOD, WHICH GOES ON FOR
10 ANOTHER WEEK AND A HALF, THEN THAT'S WHEN WE, YOU KNOW,
11 STOP AND DEVELOP OUR DECISION DOCUMENT, AND THEN WE COME
12 OUT AND TELL EVERYONE WHAT THE DECISION IS AND THEN GO
13 FORWARD WITH DESIGN, AND THEN WE HAVE MORE OPPORTUNITIES
14 FOR PUBLIC COMMENT AT THAT TIME.

15 MS. MORENO: WHEN WERE YOU HAVING YOUR NEXT COMMENT
16 MEETING?

17 MR. HARRIS-BISHOP: I DON'T KNOW YET EXACTLY. IT WILL
18 BE NEAR THE BEGINNING OF THE DESIGN PHASE, SO I'M HOPING
19 SOMETIME IN THE BEGINNING OF THE NEXT YEAR, MARCH.

20 MS. MORENO: I'M TALKING ABOUT THE COMMENT PHASE OF
21 THIS PLAN, THIS PROGRAM. BETWEEN -- BETWEEN AUGUST 12TH
22 AND SEPTEMBER 12TH?

23 MR. HARRIS-BISHOP: AND SEPTEMBER 12TH, YEAH. THAT'S
24 THE PUBLIC COMMENT PERIOD FOR MAKING THE DECISION.

25 MS. MORENO: ARE YOU GOING TO HAVE ANOTHER MEETING

1 SUCH AS THIS?

2 MR. HARRIS-BISHOP: NO, THIS IS THE ONLY ONE WE HAVE
3 UNLESS -- THE ONLY THING I CAN OFFER IS IF THERE'S A
4 COMMUNITY GROUP THAT WOULD LIKE ME TO MAKE THIS
5 PRESENTATION AGAIN, I CAN PROBABLY COME BACK DOWN BEFORE
6 THE END OF THE PUBLIC COMMENT PERIOD TO DO THAT.

7 MR. OPALSKI: WE NEED TO KNOW QUICKLY THOUGH.

8 MR. HARRIS-BISHOP: WE NEED TO KNOW BECAUSE IT'S
9 BECOMING THE END OF THE FISCAL YEAR, AND WE WOULD HAVE TO
10 MAKE SURE WE HAVE THE MONEY TO DO THAT. IT'S POSSIBLE IF
11 WE HAVE ENOUGH INTEREST, WE COULD DO THAT AGAIN. I'M
12 ALWAYS WILLING TO TALK ON THE PHONE OR YOU CAN CALL -- WE
13 HAVE A TOLL FREE NUMBER THAT YOU CAN LEAVE A MESSAGE, AND
14 THEN I CAN CALL YOU BACK.

15 I WANT TO STRESS THAT FOR OFFICIAL COMMENTS, WE
16 NEED TO HAVE THEM EITHER RECORDED BY THE COURT REPORTER OR
17 IN WRITING, AND THEN WE WILL BE ADDRESSING THEM ALL DURING
18 THAT RECORD OF DECISION DOCUMENT, AND WE'LL BE
19 INCORPORATING ALL YOUR LETTERS AND THEN HOW WE RESPONDED
20 TO THEM.

21 MR. OPALSKI: LET ME CLARIFY FOR TONIGHT'S MEETING
22 BECAUSE THERE WAS THIS SORT OF BRINGING TOGETHER OF
23 QUESTIONS AND ANSWERS AND COMMENTS, AND WE'RE GOING TO BE
24 DOING OUR BEST AT LOOKING AT THE TRANSCRIPT AND GLEANING
25 OUT EVERYTHING, QUESTIONS AND COMMENTS AND WHATEVER, SO

1 THAT WE'LL BE RESPONDING TO ALL THE SIGNIFICANT COMMENTS,
2 WHETHER THEY WERE PUT IN A QUESTION FORM OR COMMENT FORM,
3 IN THE RESPONSIVENESS SUMMARY, SO DON'T -- WE'RE MORE HUNG
4 UP WITH THEM THAN YOU ARE, SO JUST SO YOU KNOW, THAT'S HOW
5 WE'RE GOING TO HANDLE IT.

6 MR. HARRIS-BISHOP: AND I WANT TO ENCOURAGE YOU ALL IF
7 YOU DO THINK OF SOMETHING, YOU KNOW, TO WRITE IT DOWN, TO
8 SEND IT TO ME, AND I REALLY APPRECIATE IT. THANK YOU ALL
9 FOR COMING AND LISTENING. IF YOU HAVE ANY OTHER
10 QUESTIONS OR IF YOU KNOW ANYONE ELSE WHO WOULD LIKE TO GET
11 IN ON OUR MAILING LIST, PLEASE LET US KNOW AND GIVE THEM A
12 FACT SHEET SO THEY CAN COME ON OUR MAILING LIST. THANK
13 YOU.

14 (WHEREUPON THE MEETING WAS CONCLUDED AT 9:00 P.M.)
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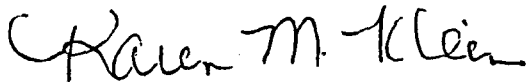
1
2
3 CERTIFICATION
4

5 I, KAREN M. KLEIN, CERTIFIED SHORTHAND REPORTER
6 NO. 5368, DO HEREBY CERTIFY THAT THE WITHIN
7 TRANSCRIPT OF PROCEEDINGS WAS TAKEN DOWN BY ME IN SHORTHAND
8 AT THE TIME AND PLACE THEREIN SET FORTH AND WAS THEREAFTER
9 TRANSCRIBED INTO TYPEWRITING UNDER MY SUPERVISION AND
10 DIRECTION.

11 I FURTHER CERTIFY THAT THE FOREGOING 90 PAGES CONTAIN
12 A TRUE AND CORRECT TRANSCRIPTION OF MY SHORTHAND NOTES SO
13 TAKEN.

14 I FURTHER CERTIFY THAT I AM NEITHER COUNSEL FOR NOR
15 RELATED TO ANY PARTY TO SAID ACTION NOR IN ANYWISE
16 INTERESTED IN THE RESULT OR OUTCOME THEREOF.

17 WITNESS MY HAND THIS 6TH DAY OF SEPTEMBER, 1993.
18

19
20 
21 KAREN M. KLEIN, CSR NO. 5368, CM
22
23
24
25

1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES)
3

4 I, KAREN M. KLEIN, CERTIFIED SHORTHAND REPORTER
5 NO. 5368, HEREBY CERTIFY THAT THE ATTACHED TRANSCRIPT OF
6 PROCEEDINGS IS A CORRECT COPY OF THE ORIGINAL TRANSCRIPT OF
7 PROCEEDINGS TAKEN BEFORE ME ON SEPTEMBER 1, 1993, AS
8 AS THEREON STATED.

9 I DECLARE UNDER PENALTY OF PERJURY THAT THE
10 FOREGOING IS TRUE AND CORRECT.

11 EXECUTED AT HACIENDA HEIGHTS, CALIFORNIA, THIS
12 6TH DAY OF SEPTEMBER, 1993.
13
14
15

16
17 Karen M. Klein
18 KAREN M. KLEIN, CSR NO. 5368, CM
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Karen M. Klein, CSR 5368, CM

ERRATA SHEET

1			
2			
3	<u>PAGE</u>	<u>LINE</u>	<u>CORRECTION</u>
4	15	3	"Did" should be "Didn't"
5	22	21	"Need" should be "Meet"
6	25	20	"Amd" should be "And"
7	31	25	"Soil" should be "Asphalt"
8	44	24	"mounted" should be "mounded"
9	45	2, 3	"Santa Fe Springs" should be "St. Paul"
10	46	2	"Expense" should be "expensive"
11	63	19	"Store" should be "door"
12	67	3	"Assume" should be "As soon"
13	67	23	Remove "?" at end of line
14			
15			
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